

**EPA REGISTRATION NUMBER 524-535 (RECORDS FROM
JANUARY 1, 2004 THROUGH JANUARY 1, 2007)**

MONSANTO



August 29, 2006

MONSANTO COMPANY
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Document Processing Center (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Attention: Mr. James A. Tompkins
Team Leader (25)

Subject: QuikPro Herbicide (EPA Reg. No. 524-535)
Submission of Final Printed Label Booklet

Dear Mr. Tompkins:

Monsanto is submitting for your files three (3) copies of the final printed label booklet for QuikPro Herbicide (EPA Reg. No. 524-535, Print Plate No. 98005E5-12/53). This label is based on the EPA stamped Master Label dated May 12, 2003. Previously, on March 6, 2006, Monsanto submitted a final printed label booklet. The enclosed label booklet, with minor Spanish grammar updates, supersedes the previous booklet. Monsanto certifies that the Spanish is an accurate translation of the English.

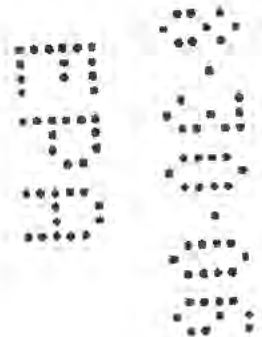
"This notification with minor revisions is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes (besides what is stated herein) have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

If you have any questions regarding this submission, please feel free to contact me through Dr. Russell P. Schneider or directly at 314-694-9036.

Sincerely,

Debra Hinton
Registration Specialist

cc: R. Schneider
D. Fee-White





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number
295547

Application for Pesticide – Section I

1. Company/Product Number Monsanto Company / 524-535	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) QuikPRO Herbicide	PM # 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I (Eye) Street, NW - Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Submission of revised final printed label booklet
REGULATORY.AFFAIRS@MONSANTO.COM

Section – III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per Container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify)	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Russell P. Schneider, Ph.D.		Title Director, Regulatory Affairs		Telephone No. (Include Area Code) (202) 383-2866	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)	
2. Signature <i>Debra Hinton</i>		3. Title Registration Specialist			
4. Typed Name Debra Hinton		5. Date August 29, 2006			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dawn Fee-White
Registration Manager
Monsanto Company
1300 I Street, NW – Suite 450 East
Washington, DC 20005

APR 11 2007

SUBJECT: Application for Pesticide Notification – Tank Mix Name Change/Warranty
MON 78365/QuikPRO Herbicide
EPA Reg. No. 524-535
Application Dated November 20, 2006

Dear Ms. Fee-White:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

MONSANTO



MONSANTO COMPANY
1501 (EYE) STREET, NW
SUITE 400 EAST
WASHINGTON, D.C. 20005
PHONE (202) 385-2866
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November 20, 2006

Document Processing Desk (NOTIF)
Registration Division – H7505C
U.S. Environmental Protection Agency
1801 South Bell Street
Crystal Mall #2, Room 266A
Arlington, Virginia 22202-4501

NOTIFICATION

APR 11 2007

Attention: Mr. James A. Tompkins
Product Manager 25

Subject: **MON 78365 Herbicide, QuikPRO Herbicide; EPA Reg. No. 524-535**
Notification of Tank Mix Brand Name Change

Dear Mr. Tompkins:

Monsanto herein notifies the Agency of a brand name change in the tank mix section of the June 19, 2006 stamped label. The tank mix listing in section 8.1 under General Weed Control, Trim-and-Edge and Bare Ground, lists Manage and this has been changed to list Certainty.

This document also includes the revisions to the Limit of Warranty and Liability as requested in the cover letter of the June 19 approval.

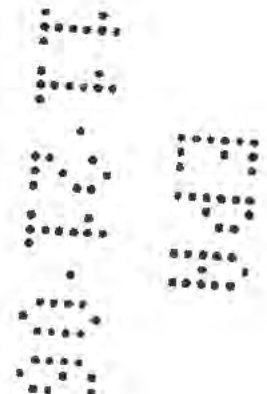
This notification with minor revisions is consistent with the provision of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you should have any questions regarding this submission, please call Dr. Russell P. Schneider at (202) 383-2866 or call me at (314) 694-6576.

Sincerely,

Dawn Fee-White
Registration Manager

Cc: Russ Schneider





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number
303852

Application for Pesticide – Section I

1. Company/Product Number Monsanto Company / 524-535	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MON 78365/QuikPRO Herbicide	PM # 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I (Eye) Street, NW - Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated	NOTIFICATION APR 11 2007
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Tank Mix Brand Name Change

REGULATORY.AFFAIRS@MONSANTO.COM

Section – III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Package wgt. No. per Container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
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Section – IV

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Name Russell P. Schneider, Ph.D.		Title Director, Regulatory Affairs	
		Telephone No. (Include Area Code) (202) 383-2866	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>Dawn Fee-White</i>		3. Title Registration Manager	
4. Typed Name Dawn Fee-White		5. Date November 20, 2006	

NOTIFICATION

APR 11 2007

Registered Brand Names:

MON 78365 Herbicide
QuikPRO Herbicide

Alternate text for brand logo: Powered by Roundup Technology

Complete Directions for Use

EPA Reg. No. 524-535

AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS, OR DESIRABLE PLANTS AND TREES, BECAUSE SEVERE INJURY OR DESTRUCTION MAY RESULT.

Read the entire label before using this product.

Use only according to label instructions.

Read the "LIMIT OF WARRANTY AND LIABILITY" statement at the end of the label before buying or using. If terms are not acceptable, return at once unopened.

THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION OR REPACKAGING.

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- 10 10.0 **LIMIT OF WARRANTY AND LIABILITY**

1.0 INGREDIENTS

ACTIVE INGREDIENTS:

* Glyphosate, N-(phosphonomethyl)glycine, in the form of its ammonium salt.....	73.3%
Diquat dibromide [6,7-dihydrodipyrido (1,2-a:2',1'-c) pyrazinedium dibromide]	2.9%
OTHER INGREDIENTS:.....	23.8%
	100.0%

* Equivalent to 66.6% of the acid, glyphosate

1.0 pound of [INSERT BRAND NAME] herbicide contains 0.73 pound of the ammonium salt of glyphosate and 0.03 pound of the dibromide salt of diquat.

This product is protected by U.S. Patent No. 7,008,904. Other patent pending. No license granted under any non-U.S. patent(s).

2.0 IMPORTANT PHONE NUMBERS

1. FOR PRODUCT INFORMATION OR ASSISTANCE IN USING THIS PRODUCT,
CALL TOLL-FREE,

1-800-332-3111.

2. IN CASE OF AN EMERGENCY INVOLVING THIS PRODUCT, OR FOR MEDICAL
ASSISTANCE, CALL COLLECT, DAY OR NIGHT,

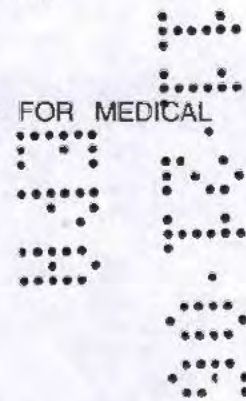
(314)-694-4000.

3.0 PRECAUTIONARY STATEMENTS

3.1 Hazards to Humans and Domestic Animals

Keep out of reach of children.

CAUTION!



HARMFUL IF SWALLOWED.

HARMFUL IF INHALED.

CAUSES MODERATE EYE IRRITATION.

Avoid breathing dust or spray mist.

Avoid contact with eyes or clothing.

Remove contaminated clothing and wash clothing before reuse.

Wash thoroughly with soap and water after handling.

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none">• Call a physician or Poison Control Center for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a Poison Control Center or physician.• Do not give anything by mouth to an unconscious person.• Quick treatment is essential to counteract poisoning and should be initiated before signs and symptoms of injury appear.
IF INHALED	<ul style="list-style-type: none">• Move person to fresh air• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a Poison Control Center or physician for further treatment advice.
IF IN EYES	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a Poison Control Center or physician for treatment advice.
<ul style="list-style-type: none">• Have the product container or label with you when calling a poison control center or physician, or going for treatment.• You may also contact (314) 694-4000, collect day or night, for emergency medical treatment information.• This product is identified as [INSERT BRAND NAME], EPA Registration No. 524-535.	

DOMESTIC ANIMALS: Keep livestock and pets out of treated areas. Do not graze livestock on treated areas. This product is considered to be relatively nontoxic to dogs and other domestic animals; however, ingestion of this product or large amounts of freshly sprayed vegetation may result in temporary gastrointestinal irritation (vomiting, diarrhea, colic, etc.). If such symptoms are observed, provide the animal with plenty of fluids to prevent dehydration. Call a veterinarian if symptoms persist for more than 24 hours.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear: Long-sleeved shirt and long pants, protective footwear plus socks, and protective eyewear. Discard clothing and other materials that have been heavily contaminated with this product's concentrate. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

3.2 Environmental Hazards

This product is toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

3.3 Physical or Chemical Hazards

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations.

Keep all unprotected persons out of operating areas or vicinity where there may be drift.

Keep people and pets off treated areas until spray solution has dried.

4.0 STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, foodstuffs, feed or seed by storage or disposal.

Keep container closed to prevent spills and contamination.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state, or local procedures.

CONTAINER DISPOSAL: Emptied container retains vapor and product residue. Observe all labeled safeguards until container is cleaned, reconditioned, or destroyed.

[*optional:* See container label for additional PESTICIDE STORAGE AND DISPOSAL instructions.]

[ALTERNATE CONTAINER LABEL DISPOSAL STATEMENTS BY CONTAINER TYPE]

[FOR PLASTIC 1-WAY CONTAINERS & BOTTLES]

Do not reuse container. Triple rinse container, then puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[FOR REFILLABLE PORTABLE CONTAINERS]

This container must only be refilled with pesticide product. **Do not reuse this container for any other purpose.** Final disposal must be in compliance with state and local regulations. If not refilled, returned, or recycled, triple rinse or pressure rinse, puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Do not transport this container if it is damaged or leaking. If the container is damaged, leaking or obsolete, or to obtain information about recycling portable refillable containers, contact Monsanto Company at 1-800-ROUNDUP (1-800-768-6387).

Users: When the container is empty, replace the cap and seal all openings that have been made during usage, and return the container to the point of purchase, or to an alternate location designated by the manufacturer at the time of purchase of this product. If not returned, triple rinse or pressure rinse the empty container and offer it for recycling if available.

Refillers: Do not reuse this mini-bulk container except for refill in accordance with a valid Monsanto Repackaging or Toll Repackaging Agreement. Prior to refilling, inspect carefully for damage such as cracks, punctures, abrasions, worn-out threads and closure devices. Check for leaks after refilling and before transporting.

[FOR BULK CONTAINERS]

Triple rinse emptied bulk container. Then offer for recycling or reconditioning, or dispose of in a manner approved by state and local authorities.

5.0 GENERAL INFORMATION

(HOW THIS PRODUCT WORKS)

Product Description: This product is a postemergence, systemic herbicide with no soil residual activity. It is generally non-selective and gives broad-spectrum control of many annual weeds, perennial weeds, woody brush and trees. It is formulated as a water-soluble granule containing surfactant and no additional surfactant is needed or recommended. It may be applied through most standard sprayers after dissolution and thorough mixing with water according to label instructions.

Time to Symptoms: This product moves through the plant from the point of foliage contact to and into the root system. Visible effects on most annual weeds occur within 1 day, and on most perennial weeds in 2 days. Extremely cool or cloudy weather following treatment may slow activity of this product and delay development of visual symptoms. Visible effects are a quick yellowing of the foliage which advances to complete browning of above-ground growth and deterioration of underground plant parts.

Mode of Action: One of the active ingredients in this product inhibits an enzyme found only in plants and microorganisms that is essential to formation of specific amino acids. A second active rapidly disrupts cell integrity of photosynthetically active tissues in the contacted foliage.

Cultural Considerations: Reduced control may result when applications are made to annual or perennial weeds that have been mowed, grazed, or cut, and have not been allowed to regrow to the recommended stage for treatment.

Rainfastness: Heavy rainfall soon after application may wash this product off of the foliage and a repeat application may be required for adequate control.

Spray Coverage: For best results, spray coverage should be uniform and complete. Do not spray weed foliage to the point of runoff.

No Soil Activity: Weeds must be emerged at the time of application to be controlled by this product. Weeds germinating from seed after application will not be controlled. Unemerged plants arising from unattached underground rhizomes or root stocks of perennials will not be affected by the herbicide and will continue to grow.

Tank Mixing: This product does not provide residual weed control. For subsequent residual weed control, follow a label-approved herbicide program. Read and carefully observe the cautionary statements and all other information appearing on the labels of all herbicides used. Use according to the most restrictive label directions for each product in the mixture.

Buyer and all users are responsible for all loss or damage in connection with the use or handling of mixtures of this product with herbicides or other materials that are not expressly recommended in this labeling. Mixing this product with herbicides or other materials not recommended on this label may result in reduced performance.

Annual Maximum Use Rate: For non-crop uses, the combined total of all treatments must not exceed 12.25 pounds of this product per acre per year.

ATTENTION

AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS, OR DESIRABLE PLANTS AND TREES, BECAUSE SEVERE INJURY OR DESTRUCTION MAY RESULT.

AVOID DRIFT. EXTREME CARE MUST BE USED WHEN APPLYING THIS PRODUCT TO PREVENT INJURY TO DESIRABLE PLANTS.

Do not allow the herbicide solution to mist, drip, drift or splash onto desirable vegetation since minute quantities of this product can cause severe damage or destruction to desirable plants or other areas on which treatment was not intended. The likelihood of injury occurring from the use of this product increases when winds are gusty, as wind velocity increases, when wind direction is constantly changing or when there are other meteorological conditions that favor spray drift. When spraying, avoid combinations of pressure and nozzle type that will result in splatter or fine particles (mist) which are likely to drift. AVOID APPLYING AT EXCESSIVE SPEED OR PRESSURE.

NOTE: Use of this product in any manner not consistent with this label may result in injury to persons, animals or desirable plants, or other unintended consequences. Keep container closed to prevent spills and contamination.

6.0 MIXING

Clean sprayer parts immediately after using this product by thoroughly flushing with water.

NOTE: REDUCED RESULTS MAY OCCUR IF WATER CONTAINING SOIL IS USED, SUCH AS VISIBLY MUDDY WATER OR WATER FROM PONDS AND DITCHES THAT IS NOT CLEAR.

Use caution to avoid siphoning back into the carrier source. Use approved anti-back-siphoning devices where required by state or local regulations. During mixing and application, foaming of the spray solution may occur. To prevent or minimize foam, avoid the use of mechanical agitators, terminate by-pass and return lines at the bottom of the tank and, if needed, use an approved anti-foam or defoaming agent.

6.1 Procedure for Preparing Spray Solution

Use the following procedure to mix this product in water alone or when preparing tank mixtures with other labeled products.

1. Place a 20- to 35-mesh screen or wetting basket over filling port.
2. Through the screen, fill the spray tank one-half full with water and start agitation.
3. Add [INSERT BRAND NAME] herbicide using a circular motion while pouring.
4. If second product is a wettable powder, first make a slurry with the water carrier, then add the slurry SLOWLY through the screen into the tank. Continue agitation.
5. If a flowable formulation is used, premix one part flowable with one part water. Add diluted mixture SLOWLY through the screen into the tank. Continue agitation.

6. If an emulsifiable concentrate formulation is used, premix one part emulsifiable concentrate with two parts water. Add diluted mixture slowly through the screen into the tank. Continue agitation.
7. Continue filling the spray tank with water and add water soluble liquids near the end of the filling process.

When tank mixing [INSERT BRAND NAME] herbicide with other products, maintain good agitation at all times until the contents of the tank are sprayed. If the spray mixture is allowed to settle, thorough agitation is required to resuspend the mixture before spraying is resumed.

Keep by-pass line on or near the bottom of the tank to minimize foaming. Screen size in nozzle or line strainers should be no finer than 50-mesh.

Always predetermine the compatibility of labeled tank mixtures of this product with water carrier by mixing small proportional quantities in advance.

Refer to the **Tank Mixing** section of **GENERAL INFORMATION** for additional precautions.

6.2 Mixing for Hand-Held Sprayers

Prepare the desired volume of spray solution by adding the desired amount of this product as shown in the following table to a clean, empty sprayer. Add the appropriate amount of water and stir or agitate to ensure dissolution of [INSERT BRAND NAME] herbicide. For use in backpack sprayers, it is suggested that the recommended amount of this product be mixed with water in a larger container. Fill sprayer with the mixed solution.

Spray Solution

Amount of [Insert brand name] herbicide

Desired Volume	Annuals	Perennials	Brush	Low-Volume Directed
1 Gal	1.2 oz	1.5 oz	1.5 oz	4.0 oz to 8.0 oz
3 Gal	3.6 oz	4.5 oz	4.5 oz	12.0 oz to 1.5 lb
10 Gal	12.0 oz	15.0 oz	15.0 oz	2.5 lb to 5.0 lb

6.3 Colorants or Dyes

Agriculturally-approved colorants or marking dyes may be added to this product. Colorants or dyes used in spray solutions of this product may reduce performance, especially at lower rates or dilutions. Use colorants or dyes according to the manufacturer's recommendations. Certain blue dyes are not stable in the spray solution in the presence of this product. A jar test to determine if the desired blue dye is stable is recommended. If stability is a problem consider switching to an alternate color dye.

6.4 Drift Control Additives

Drift control additives may be used with all equipment types. When a drift control additive is used, read and carefully observe the cautionary statements and all other information appearing on the additive label.

7.0 APPLICATION EQUIPMENT AND TECHNIQUES

SPRAY DRIFT MANAGEMENT

AVOID DRIFT. EXTREME CARE MUST BE USED WHEN APPLYING THIS PRODUCT TO PREVENT INJURY TO DESIRABLE PLANTS.

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment- and weather-related factors determines the potential for spray drift. The applicator is responsible for considering all these factors when making decisions.

Do not apply this product by air.

Do not apply this product through any type of irrigation system.

Do not allow the herbicide solution to mist, drip, drift or splash onto desirable vegetation since minute quantities of this product can cause severe damage or destruction to desirable plants or other areas on which treatment was not intended.

APPLY THESE SPRAY SOLUTIONS IN PROPERLY MAINTAINED AND CALIBRATED EQUIPMENT CAPABLE OF DELIVERING DESIRED VOLUMES.

7.1 Ground Broadcast Equipment

Use the recommended rates of this product in 10 to 80 gallons of water per acre as a broadcast spray unless otherwise specified. As density of weeds increases, spray volume should be increased within the recommended range to ensure complete coverage. Carefully select proper nozzles to avoid spraying a fine mist. For best results with ground application equipment, use flat-fan nozzles. Check for even distribution of spray droplets.

7.2 Backpack or Hand-Held Equipment

Apply to foliage of vegetation to be controlled. For applications made on a spray-to-wet basis, spray coverage should be uniform and complete. Do not spray to the point of runoff. Use coarse sprays only.

For control of weeds listed in the **Annual Weeds** section of the **WEEDS CONTROLLED** section, apply 1.2 ounces of this product per 1 gallon of spray solution. See table in **Mixing for Hand-Held Sprayers** section for larger mixing volumes.

For best results, use 1.5 ounces of this product per 1 gallon of spray solution on harder-to-control perennials, such as bermudagrass, dock, field bindweed, hemp dogbane, milkweed and Canada thistle. See table in **Mixing for Hand-Held Sprayers** section for larger mixing volumes.

For low-volume directed spray applications, use 4.0 to 8.0 ounces of this product per 1 gallon of spray solution for control or partial control of brush weeds. See table in **Mixing for Hand-Held Sprayers** section for larger mixing volumes. Spray coverage should be uniform with at least 50 percent of the foliage contacted. Coverage of the top one-half of the plant is important for best results. To ensure adequate spray coverage, spray both sides of brush and tree seedlings when foliage is thick and dense, or where there are multiple sprouts.

7.3 CDA Equipment (optional section)

The rate of this product applied per acre by controlled droplet application (CDA) equipment must not be less than the amount recommended in this label when applied by conventional broadcast equipment. For vehicle mounted CDA equipment, apply 3 to 15 gallons of water per acre.

For hand-held CDA units, apply a solution of 1.5 to 2.0 pounds of this product in one gallon of water at a flow rate of 2 fluid ounces per minute and a walking speed of 0.75 miles per hour.

CDA equipment produces a spray pattern which is not easily visible. Extreme care must be exercised to avoid spray or drift contacting the foliage or any other green tissue of desirable vegetation, as damage or destruction is likely to result.

8.0 SITE AND USE RECOMMENDATIONS

Detailed instructions follow alphabetically, by site.

Unless otherwise specified, applications may be made to control any weeds listed in the annual, perennial and brush weeds and tree seedlings tables.

8.1 General Non-crop Areas and Industrial Sites

Use in non-crop and non-timber areas only, such as airports, apartment complexes, ditch banks, dry ditches, dry canals, fencerows, golf courses, lumberyards, manufacturing sites, office

complexes, parks, parking areas, recreational areas, residential areas, schools, storage areas, warehouse areas, other public areas, and similar industrial and non-crop sites.

This product is **not** for use on crops, timber, or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

General Weed Control, Trim-and-Edge and Bare Ground

This product may be used in general non-crop areas. It may be applied with any application equipment described in this label. This product may be used to trim-and-edge around objects in non-crop sites, for spot treatment of unwanted vegetation, and to eliminate unwanted weeds growing in established shrub beds or ornamental plantings. This product may be used prior to planting an area to ornamentals, flowers, turfgrass (sod or seed), or prior to laying asphalt or beginning construction projects. This product is **not** for use on plants grown for sale or other commercial use, or for commercial seed production.

Repeated applications of this product may be used as weeds emerge to maintain bare ground.

This product may be tank mixed with the following products. Refer to these products' labels for approved non-crop sites and application rates.

BANVEL

BARRICADE™ 65WG

DIMENSION™ 4 EC

ENDURANCE™

~~MANAGE®~~—CERTAINTY®

PENDIMETHALIN

PENDULUM™ 3.3 EC

PENDULUM WDG

RONSTAR™ 50WP

SURFLAN™

2,4-D

When applied as a tank mixture for bare ground, [INSERT BRAND NAME] herbicide provides control of the emerged annual weeds and control or partial control of emerged perennial weeds.

Dormant Turfgrass

This product may be used to control or suppress many winter annual weeds and tall fescue for effective release of dormant bermudagrass and bahiagrass turf. Treat only when turf is dormant and prior to spring greenup. This product is **not** for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Apply 5 to 16 ounces of this product per acre. Apply the recommended rates in 10 to 80 gallons of water per acre. Use only in areas where bermudagrass or bahiagrass are desirable ground covers and where some temporary injury or discoloration can be tolerated.

Treatments in excess of 9 ounces per acre may result in injury or delayed greenup in highly maintained areas, such as golf courses and lawns.

Turfgrass Renovation (Except for Commercial Sod Farms)

This product controls most existing vegetation prior to renovating turfgrass areas. This product is not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes. For maximum control of existing vegetation, delay planting or sodding to determine if any regrowth from escaped underground plant parts occurs. Where repeat treatments are necessary, sufficient regrowth must be attained prior to application. **Do not**

use this product for renovation of bermudagrass or kikuyugrass sods. Where existing vegetation is growing under mowed turfgrass management, apply this product after omitting at least one regular mowing to allow sufficient growth for good interception of the spray.

Do not disturb soil or underground plant parts before treatment. Tillage or renovation techniques such as vertical mowing, coring or slicing should be delayed for 7 days after application to allow translocation into underground plant parts.

Desirable turfgrasses may be planted following the above procedures.

Hand-held equipment may be used for spot treatment of unwanted vegetation growing in existing turfgrass.

Do not feed or graze treated turfgrass or feed treated thatch to livestock.

8.2 Parks, Recreational and Residential Areas

This product may be used in parks, recreational and residential areas. It may be applied with any application equipment described in this label. This product may be used to trim-and-edge around trees, fences, paths, around buildings, sidewalks, and other objects in these areas. This product may be used for spot treatment of unwanted vegetation. This product may be used to eliminate unwanted weeds growing in established shrub beds or ornamental plantings. This product may be used prior to planting an area to ornamentals, flowers, turfgrass (sod or seed), or prior to laying asphalt or beginning construction projects.

All of the instructions in the **General Non-Crop Areas and Industrial Sites** section apply to park and recreational areas. This product is not for use around plants being grown for sale or other commercial use.

9.0 WEEDS CONTROLLED

Always use the higher rate of this product per acre within the recommended range when weed growth is heavy or dense or weeds are growing in an undisturbed (noncultivated) area.

Reduced results may occur when treating weeds heavily covered with dust. For weeds that have been mowed, grazed or cut, allow regrowth to occur prior to treatment.

Refer to the following label sections for recommended rates for the control of annual and perennial weeds. For difficult to control perennial weeds and where plants are growing under stressed conditions, or where infestations are dense, this product may be used at up to 12.25 pounds per acre for enhanced results.

9.1 Annual Weeds

Use 2.25 to 4.5 pounds per acre of this product as a broadcast spray to control annual weeds. When using rates less than 4.5 pounds per acre, the level of fast-burn symptomology may be reduced.

For spray-to-wet applications, apply 1.2 ounces of this product per 1 gallon of spray solution.

WEED SPECIES

Anoda, spurred
Barley*
Barnyardgrass*
Bassia, fivehook
Bittercress*
Black nightshade*
Bluegrass, annual*
Bluegrass, bulbous*
Brome, downy*
Brome, Japanese*
Browntop panicum*
Buttercup*

Carolina foxtail*
 Carolina geranium
 Castor bean
 Cheatgrass*
 Cheeseweed (*Malva parviflora*)
 Chervil*
 Chickweed*
 Cocklebur*
 Copperleaf, hophornbeam
 Corn*
 Corn speedwell*
 Crabgrass*
 Dwarf dandelion*
 Eastern manna grass*
 Eclipta*
 Fall panicum*
 Falsedandelion*
 False flax, small seed*
 Fiddleneck
 Field pennycress*
 Filaree
 Fleabane, annual*
 Fleabane, hairy (*Conyza bonariensis*)*
 Fleabane, rough*
 Florida pusley
 Foxtail*
 Goatgrass, jointed*
 Goosegrass
 Grain sorghum (milo)*
 Groundsel, common*
 Hemp sesbania
 Herbit
 Horseweed/Marestail (*Conyza canadensis*)
 Itchgrass*
 Johnson grass, seedling
 Junglerice
 Knotweed
 Kochia
 Lambsquarters*
 Little barley*
 London rocket*
 Mayweed
 Medusahead*
 Morningglory (*Ipomoea spp.*)
 Mustard, blue*
 Mustard, tansy*
 Mustard, tumble*
 Mustard, wild*
 Oats
 Pigweed*
 Plains/Tickseed coreopsis*
 Prickly lettuce*
 Purslane, common
 Ragweed, common*
 Ragweed, giant
 Red rice

Russian thistle
Rye*
Ryegrass*
Sandbur, field*
Shattercane*
Shepherd's-purse*
Sicklepod
Signalgrass, broadleaf*
Smartweed, ladythumb*
Smartweed, Pennsylvania*
Sowthistle, annual
Spanishneedles
Speedwell, purslane*
Sprangletop*
Spurge, annual
Spurge, prostrate*
Spurge, spotted*
Spurry, umbrella*
Starthistle, yellow
Stinkgrass*
Sunflower*
Teaweed/ Prickly sida
Texas panicum*
Velvetleaf
Virginia copperleaf
Virginia pepperweed*
Wheat*
Wild oats*
Witchgrass*
Woolly cupgrass*
Yellow rocket

- * When using field broadcast equipment (boom sprayers using flat-fan nozzles) these species will be controlled or partially controlled. Applications must be made using 10 to 80 gallons of carrier volume per acre. Use nozzles that ensure thorough coverage of foliage and treat when weeds are in an early growth stage.

9.2 Perennial Weeds

Best results are obtained when perennial weeds are treated after they reach the reproductive stage of growth (seedhead initiation in grasses and bud formation in broadleaves). For non-flowering plants, best results are obtained when the plants reach a mature stage of growth. In many situations, treatments are required prior to these growth stages. Under these conditions, use the higher application rate within the recommended range.

Use 4.5 to 9.0 pounds per acre of this product as a broadcast spray to control perennial weeds. When using rates less than 9.0 pounds per acre, the level of fast-burn symptomology may be reduced.

For spray-to-wet applications, apply 1.5 ounces of this product per 1 gallon of spray solution. Ensure thorough coverage when using spray-to-wet treatments using hand-held equipment.

When using hand-held equipment for low-volume directed spot treatments, apply 4.0 to 8.0 ounces of this product per 1 gallon of spray solution.

Allow 7 or more days after application before tillage.

Weed Species

Alfalfa*
 Alligatorweed*
 Anise (fennel)
 Bahiagrass
 Beachgrass, European (*Ammophila arenaria*)
 Bentgrass*
 Bermudagrass*
 Bermudagrass, water (knotgrass)
 Bindweed, field
 Bluegrass, Kentucky
 Blueweed, Texas
 Bromegrass, smooth
 Bursage, woolly-leaf
 Canarygrass, reed
 Cattail
 Clover; red, white*
 Cogongrass
 Dallisgrass
 Dandelion
 Dock, curly
 Dogbane, hemp
 Fescue
 Fescue, tall
 German ivy
 Guineagrass
 Horsenettle
 Horseradish
 Iceplant
 Jerusalem artichoke
 Johnsongrass
 Kikuyugrass*
 Knapweed
 Lantana
 Lespedeza
 Milkweed, common
 Muhly, wirestem
 Mullein, common
 Napiergrass
 Nightshade, silverleaf
 Nutsedge; purple, yellow
 Orchardgrass
 Pampasgrass
 Paragrass
 Pepperweed, perennial
 Phragmites*
 Poison hemlock
 Quackgrass
 Redvine*
 Reed, giant
 Ryegrass, perennial
 Spurge, leafy*
 Thistle, artichoke
 Thistle, Canada

Timothy
Torpedograss*
Trumpet creeper*
Vaseygrass
Velvetgrass
Wheatgrass, western

*Partial control

9.3 Brush Weeds and Tree Seedlings

Best results are obtained when brushweeds are treated when they are in the seedling stage of growth. In many situations, re-treatment is required on larger plants. Under these conditions, use the higher application rate within the recommended range.

Use 9.0 pounds per acre of this product as a broadcast spray to control brush weeds.

For spray-to-wet applications, apply 1.5 ounces of this product per 1 gallon of spray solution. Ensure thorough coverage when using spray-to-wet treatments using hand-held equipment.

When using hand-held equipment for low-volume directed spot treatments, apply 4.0 to 8.0 ounces of this product per 1 gallon of spray solution.

Allow 7 or more days after application before tillage.

Weed Species

Alder
Ash*
Beech*
Birch
Blackberry
Blackgum
Cherry; bitter, black, pin
Dogwood*
Elderberry
Elm*
Honeysuckle
Locust, black*
Maple, red
Maple, sugar
Oak, black*
Oak, northern pin
Oak, post
Oak, red
Oak, scrub*
Oak, southern red
Oak, white*
Peppertree, Brazilian (Florida holly)*
Pine
Poison ivy*
Poison oak*
Poplar, yellow*
Redbud, eastern
Rose, multiflora
Saltcedar*

Sumac; laurel, poison, smooth, sugarbush, winged*
Sweetgum
Vine maple*
Virginia creeper
Waxmyrtle, southern*

* Partial Control

10.0 LIMIT OF WARRANTY AND LIABILITY

Monsanto Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in the Complete Directions for Use label booklet ("Directions") when used in accordance with those Directions under the conditions described therein. NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated herein.

Buyer and all users shall promptly notify this Company of any claims whether based in contract, negligence, strict liability, other tort or otherwise.

To the fullest extent permitted by law, buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those set forth in the Directions, application to or contact with desirable vegetation, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the product is applied, as well as weather conditions which are outside the application ranges set forth in the Directions, application in any manner not explicitly set forth in the Directions, moisture conditions outside the moisture range specified in the Directions, or the presence of products other than those set forth in the Directions in or on the soil, crop or treated vegetation.

This Company does not warrant any product reformulated or repackaged from this product except in accordance with this Company's stewardship requirements and with express written permission from this Company.

THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF THE LIABILITY OF THIS COMPANY OR ANY OTHER SELLER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY OTHER SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. TO THE FULLEST EXTENT PERMITTED BY LAW, IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

Upon opening and using this product, buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement. If terms are not acceptable, return at once unopened.

Certainty, MON 78365, QuikPRO, Monsanto and the Vine symbol are trademarks of Monsanto Technology LLC.

EPA Reg. No. 524-535

524-535 Master Label
Notification 11-20-06

Page 15 of 16

Approved June 19, 2006

In case of an emergency involving this product,
Call Collect, day or night, (314) 694-4000.

©[date] MONSANTO COMPANY
ST. LOUIS, MISSOURI, 63167 U.S.A.

John Jamula/DC/USEPA/US
06/16/2006 09:02 AM

To Linda Arrington/DC/USEPA/US@EPA
cc Jim Tompkins/DC/USEPA/US@EPA, Vickie
Walters/DC/USEPA/US@EPA
bcc
Subject Re: Fw: D-366232

Linda,

OPPIN won't let me unlink the receipt from the decision because a letter has been created. We need to ask Steve to fix this. Or we can change it to non-PRIA.

jj.

Linda Arrington/DC/USEPA/US



Linda
Arrington/DC/USEPA/US
06/15/2006 03:16 PM

To John Jamula/DC/USEPA/US@EPA
cc Jim Tompkins/DC/USEPA/US@EPA, Vickie
Walters/DC/USEPA/US@EPA
Subject Fw: D-366232

Hi JJ,

Based on my conversation with the PM, this should not be a new PRIA action, but rather a resubmission. Please delete the bill for the decision above. The company have been notified to ignore the 75-Day letter and bil.

Thanks

Linda Arrington
Registration Division
703 305 6249
703 305 6920 (fax)

----- Forwarded by Linda Arrington/DC/USEPA/US on 06/15/2006 03:14 PM -----



"FEE-WHITE, DAWN M
[AG/1000]"
<dawn.m.fee-white@monsant
o.com>

06/15/2006 01:31 PM

To Linda Arrington/DC/USEPA/US@EPA
cc
Subject RE: D-366232

Linda, I tried to call you but voice mail is full. We spoke before your move about the R34 fee of \$3,150 on 524-535 OPP Decision D-366232. I explained that we had already paid in June 2004 for the data submission on MRID 46291001 DP barcode D305484 requesting reduced PPE. We later had a meeting with the Agency to discuss this further. At the meeting Rick Loranger requested I send additional information and explain the product was a dry that was diluted prior to spray and that the information be sent to Jim Tompkins as well. I did this dated March 10, 2006. On March 29 I received the notice of subject to registration service fee. I later called you and at that time you were going to look into it and get back to me. Well it have obviously fallen off both of our radar-screens until I received the 75-day notice of unpaid registration fee for this same item. I would like to discuss this with you, resolve the fee and get an updated notice for no fee due. Please contact me at your convenience at

314-694-6576.

Thank you
Dawn Fee-White
Registration Manager
Monsanto Company

This e-mail message may contain privileged and/or confidential information, and is intended to be received only by persons entitled to receive such information. If you have received this e-mail in error, please notify the sender immediately. Please delete it and all attachments from any servers, hard drives or any other media. Other use of this e-mail by you is strictly prohibited.

All e-mails and attachments sent and received are subject to monitoring, reading and archival by Monsanto. The recipient of this e-mail is solely responsible for checking for the presence of "Viruses" or other "Malware". Monsanto accepts no liability for any damage caused by any such code transmitted by or accompanying this e-mail or any attachment.

Jim Tompkins/DC/USEPA/US

04/14/2006 08:34 AM

To Vickie Walters/DC/USEPA/US@EPA

cc

bcc

Subject Fw: 524-535 new submission

FYI

Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Phone 703 305 5697

Fax 703 308 1825

E-mail Tompkins.jim@EPA.GOV

— Forwarded by Jim Tompkins/DC/USEPA/US on 04/14/2006 08:32 AM —

Linda
Arrington/DC/USEPA/US

04/13/2006 05:05 PM

To Jim Tompkins/DC/USEPA/US@EPA

cc

Subject 524-535 new submission

Jim,

A new submission for 524-535 was submitted in 3/06. It was suppose to be a resubmission of D-344884, but was given a new PRIA code R34. Please let me see the submission so that I can change take the PRIA off and have it linked as a resubmission.

Thanks

Linda Arrington
Registration Division
703 305 6249
703 305 6920 (fax)

MONSANTO



MONSANTO COMPANY
1300 I (EYE) STREET, NW
SUITE 450 EAST
WASHINGTON, D.C. 20005
PHONE: (202) 383-2866
FAX: (202) 789-1748
<http://www.monsanto.com>

Document Processing Center (OTHER)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S4900
Arlington, VA 22202

Attention: Mr. James A. Tompkins
Team Leader (25)

Subject:

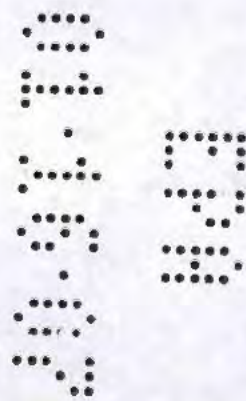
Dear Mr. Tompkins:

Subject: QuikPro Herbicide (EPA Reg. No. 524-535)
Submission of Final Printed Label Booklet

Dear Mr. Tompkins:

Enclosed for your files is the final printed label booklet for QuikPRO Herbicide (EPA Reg. No. 524-535, Print Plate No. 98005E6-12/53). Revisions incorporated as per EPA approval letter dated June 19, 2006. Other minor revisions are as follows:

- Bottom of Section 1.0 added patent statement.
- Bottom of First Aid box, corrected contact # from 694-9000 to 694-4000
- Section 4.0 under CONTAINER DISPOSAL paragraph - deleted "See container label for additional...etc."
- Section 5.0 - Product Description: changed "postemergent" to "postemergence" per EFP.
- Section 6.2, added "to" in between "Low-Volume" & "Directed" columns in the spray solution table
- Section 7.0 2nd paragraph removed the words "and the grower are" from the last sentence
- Under 9.1, deleted "2.25 to" and "When using rates less than 4.5 pounds..etc." & combined "For Spray -to-wet etc. into 1 paragraph
- Section 9.1, very last paragraph, deleted "using 4.5 pounds of this product per acre"
- Section 9.2, 2nd paragraph, deleted "4.5 to" also deleted "When using rates less than etc." & deleted "a" between "apply" and 1.5 ounces"



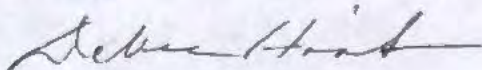
January 10, 2007
QuikPro Herbicide (EPA Reg. No. 524-535)
Submission of Final Printed Label Booklet
Page 2

- Section 9.3, under "Weed Species list" took out the weed "Oak, red" & put "Oak, northern pin" in alpha order
- Under 10.0, added "To the fullest extent permitted by law"
- Under 10.0, deleted "Manage" and "MON 78365", added "Roundup Technology, and ", "Surflan, Barricade, Ronstare
- Added "Product of Brazil; Formulated in the U.S. with U.S. Ingredients."

"This notification with minor revisions is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes (besides what is stated herein) have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

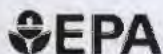
If you have any questions regarding this submission, please feel free to contact me through Dr. Russell P. Schneider or directly at 314-694-9036.

Sincerely,



Debra Hinton
Registration Specialist

cc: R. Schneider
D. Fee-White



United States
Environmental Protection Agency
 Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number
303853

Application for Pesticide - Section I

1. Company/Product Number Monsanto Company / 524-535	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MON 78365/QuikPRO Herbicide	PM # 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I (Eye) Street, NW - Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 6/19/2004
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Final printed label booklet - PP# 98005E6-12/53
 REGULATORY.AFFAIRS@MONSANTO.COM

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Package wgt. No. per Container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Russell P. Schneider, Ph.D.	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (202) 383-2866
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registration Specialist	
4. Typed Name Debra Hinton	5. Date January 11, 2007	

Material to be added to a Mini-Jacket
(in the case where an e-Jacket exists)

Reg. No. 524-535

Send to SIG: check box ☒

This material is:

- ☒ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label
- ☐ Other: _____

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Vickie K Walters

Phone: 703-305-5704 Division: RD/HB/pm-25

Date: 6/19/06

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



JUN 19 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Dawn Fee-White
Monsanto Company
1300 I (Eye) Street, NW, Suite 450 East
Washington, DC 20005

Dear Ms. Fee-White:

Subject: QuickPro Herbicide (Reduce PPE)
EPA Registration No. 524-535
Application Date June 2, 2004 and Letter Dated March 10, 2006

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable, provided you make the following changes before you release the product for shipment.

1. In your Limit of Warranty and Liability, revise the third paragraph to read "**To the fullest extent permitted by law**, buyer and all users are responsible for loss or damage from use or handling which results from conditions beyond the control of this company..."
2. In your Limit of Warranty and Liability, revise the last sentence of the fifth paragraph to read "**TO THE FULLEST EXTENT PERMITTED BY LAW, IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES.**"

Please submit one copy of your final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling supersedes all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

James A. Tompkins
James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

MASTER LABEL FOR EPA REG. NO. 524-535

Registered Brand Names:

**MON 78365 Herbicide
QuikPRO Herbicide**

Alternate text for brand logo: Powered by Roundup Technology

Complete Directions for Use

EPA Reg. No. 524-535

AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS OR FRUIT OF CROPS, DESIRABLE PLANTS AND TREES, BECAUSE SEVERE INJURY OR DESTRUCTION MAY RESULT.

Read the entire label before using this product.

Use only according to label instructions.

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

Read the "LIMIT OF WARRANTY AND LIABILITY" statement at the end of the label before buying or using. If terms are not acceptable, return at once unopened.

THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION OR REPACKAGING.

Container Label Statements:

Refillable container:

THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION. IT IS INTENDED THAT REPACKAGING BE ONLY IN ACCORDANCE WITH A MONSANTO REPACKAGING OR TOLL REPACKAGING AGREEMENT.

Non-refillable container:

THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION OR REPACKAGING.

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1.0 INGREDIENTS

ACTIVE INGREDIENT:

*Glyphosate, N-(phosphonomethyl)
glycine, in the form of its ammonium salt..... 73.3%

Diquat dibromide [6,7-dihydrodipyrido
(1,2-a:2',1'-c) pyrazinedium dibromide]..... 2.9%

OTHER INGREDIENTS:..... 23.8%
100.0%

* Equivalent to 66.6% of the acid, glyphosate

1.0 pound of [INSERT BRAND NAME] herbicide contains 0.73 pounds of the ammonium salt of glyphosate and 0.03 pounds of the dibromide salt of diquat.

2.0 IMPORTANT PHONE NUMBERS

1. FOR PRODUCT INFORMATION OR ASSISTANCE IN USING THIS PRODUCT,
CALL TOLL-FREE,

1-800-332-3111

2. IN CASE OF AN EMERGENCY INVOLVING THIS PRODUCT, OR FOR MEDICAL
ASSISTANCE, CALL COLLECT, DAY OR NIGHT,

(314)-694-4000

3.0 PRECAUTIONARY STATEMENTS

3.1 Hazards to Humans and Domestic Animals

Keep out of reach of children.

CAUTION!

HARMFUL IF SWALLOWED

HARMFUL IF INHALED

CAUSES MODERATE EYE IRRITATION

Avoid breathing dust or spray mist.

Avoid contact with eyes or clothing.

Remove contaminated clothing and wash clothing before reuse.

Wash thoroughly with soap and water after handling.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUN 19 2006

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
524-535

FIRST AID	
If Swallowed	<ul style="list-style-type: none">• Call a physician or Poison Control Center for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a Poison Control Center or physician.• Do not give anything by mouth to an unconscious person.• Quick treatment is essential to counteract poisoning and should be initiated before signs and symptoms of injury appear.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a Poison Control Center or physician for further treatment advice.
If In Eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a Poison Control Center or physician for treatment advice.
Have the product container or label with you when calling a poison control center or physician, or going for treatment. You may also contact (314) 694-9000, collect day or night, for emergency medical treatment information. This product is identified as [INSERT BRAND NAME], EPA Registration No. 524-535.	

DOMESTIC ANIMALS: Keep livestock and pets out of treated areas. Do not graze livestock on treated areas. This product is considered to be relatively nontoxic to dogs and other domestic

animals; however, ingestion of this product or large amounts of freshly sprayed vegetation may result in temporary gastrointestinal irritation (vomiting, diarrhea, colic, etc.). If such symptoms are observed, provide the animal with plenty of fluids to prevent dehydration. Call a veterinarian if symptoms persist for more than 24 hours.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear: Long-sleeved shirt and long pants, protective footwear plus socks, and protective eyewear. Discard clothing and other materials that have been heavily contaminated with this product's concentrate. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

3.2 Environmental Hazards

This product is toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

3.3 Physical or Chemical Hazards

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations.

Keep all unprotected persons out of operating areas or vicinity where there may be drift.

Keep people and pets off treated areas until spray solution has dried.

4.0 STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, foodstuffs, feed or seed by storage or disposal.

Keep container closed to prevent spills and contamination.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state, or local procedures.

CONTAINER DISPOSAL: Emptied container retains vapor and product residue. Observe all labeled safeguards until container is cleaned, reconditioned, or destroyed.

See container label for additional PESTICIDE STORAGE AND DISPOSAL instructions.

[ALTERNATE CONTAINER LABEL DISPOSAL STATEMENTS BY CONTAINER TYPE]

[FOR PLASTIC 1-WAY CONTAINERS & BOTTLES]

Do not reuse container. Triple rinse container, then puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[FOR REFILLABLE PORTABLE CONTAINERS]

This container must only be refilled with pesticide product. **Do not reuse this container for any other purpose.** Final disposal must be in compliance with state and local regulations. If not refilled, returned, or recycled, triple rinse or pressure rinse, puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Do not transport this container if it is damaged or leaking. If the container is damaged, leaking or obsolete, or to obtain information about recycling portable refillable containers, contact Monsanto Company at 1-800-ROUNDUP (1-800-768-6387).

Users: When the container is empty, replace the cap and seal all openings that have been made during usage, and return the container to the point of purchase, or to an alternate location designated by the manufacturer at the time of purchase of this product. If not returned, triple rinse or pressure rinse the empty container and offer it for recycling if available.

Refillers: Do not reuse this mini-bulk container except for refill in accordance with a valid Monsanto Repackaging or Toll Repackaging Agreement. Prior to refilling, inspect carefully for damage such as cracks, punctures, abrasions, worn-out threads and closure devices. Check for leaks after refilling and before transporting.

[FOR BULK CONTAINERS]

Triple rinse emptied bulk container. Then offer for recycling or reconditioning, or dispose of in a manner approved by state and local authorities.

5.0 GENERAL INFORMATION (HOW THIS PRODUCT WORKS)

Product Description: This product is a postemergent, systemic herbicide with no soil residual activity. It is generally non-selective and gives broad spectrum control of many annual weeds,

perennial weeds, woody brush and trees. It is formulated as a water-soluble granule containing surfactant and no additional surfactant is needed or recommended. It may be applied through most standard sprayers after dissolution and thorough mixing with water according to label instructions.

Time to Symptoms: This product moves through the plant from the point of foliage contact to and into the root system. Visible effects on most annual weeds occur within 1 day, and on most perennial weeds in 2 days. Extremely cool or cloudy weather following treatment may slow activity of this product and delay development of visual symptoms. Visible effects are a quick yellowing of the foliage which advances to complete browning of above-ground growth and deterioration of underground plant parts.

Mode of Action: One of the active ingredients in this product inhibits an enzyme found only in plants and microorganisms that is essential to formation of specific amino acids. A second active rapidly disrupts cell integrity of photosynthetically active tissues in the contacted foliage.

Cultural Considerations: Reduced control may result when applications are made to annual or perennial weeds that have been mowed, grazed, or cut, and have not been allowed to regrow to the recommended stage for treatment.

Rainfastness: Heavy rainfall soon after application may wash this product off of the foliage and a repeat application may be required for adequate control.

Spray Coverage: For best results, spray coverage should be uniform and complete. Do not spray weed foliage to the point of runoff.

No Soil Activity: Weeds must be emerged at the time of application to be controlled by this product. Weeds germinating from seed after application will not be controlled. Unemerged plants arising from unattached underground rhizomes or root stocks of perennials will not be affected by the herbicide and will continue to grow.

Tank Mixing: This product does not provide residual weed control. For subsequent residual weed control, follow a label-approved herbicide program. Read and carefully observe the cautionary statements and all other information appearing on the labels of all herbicides used. Use according to the most restrictive label directions for each product in the mixture.

Buyer and all users are responsible for all loss or damage in connection with the use or handling of mixtures of this product with herbicides or other materials that are not expressly recommended in this labeling. Mixing this product with herbicides or other materials not recommended on this label may result in reduced performance.

Annual Maximum Use Rate: For noncrop uses, the combined total of all treatments must not exceed 12.25 pounds of this product per acre per year.

ATTENTION

AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS OR FRUIT OF CROPS, DESIRABLE PLANTS AND TREES, BECAUSE SEVERE INJURY OR DESTRUCTION MAY RESULT.

AVOID DRIFT. EXTREME CARE MUST BE USED WHEN APPLYING THIS PRODUCT TO PREVENT INJURY TO DESIRABLE PLANTS AND CROPS.

Do not allow the herbicide solution to mist, drip, drift or splash onto desirable vegetation since minute quantities of this product can cause severe damage or destruction to the crop, plants or other areas on which treatment was not intended. The likelihood of injury occurring from the use of this product increases when winds are gusty, as wind velocity increases, when wind direction is constantly changing or when there are other meteorological conditions that favor spray drift. When spraying, avoid combinations of pressure and nozzle type that will result in splatter or fine particles (mist) which are likely to drift. **AVOID APPLYING AT EXCESSIVE SPEED OR PRESSURE.**

NOTE: Use of this product in any manner not consistent with this label may result in injury to persons, animals or crops, or other unintended consequences. Keep container closed to prevent spills and contamination.

6.0 MIXING

Clean sprayer parts immediately after using this product by thoroughly flushing with water.

NOTE: REDUCED RESULTS MAY OCCUR IF WATER CONTAINING SOIL IS USED, SUCH AS VISIBLY MUDDY WATER OR WATER FROM PONDS AND DITCHES THAT IS NOT CLEAR.

Use caution to avoid siphoning back into the carrier source. Use approved anti-back-siphoning devices where required by state or local regulations. During mixing and application, foaming of the spray solution may occur. To prevent or minimize foam, avoid the use of mechanical agitators, terminate by-pass and return lines at the bottom of the tank and, if needed, use an approved anti-foam or defoaming agent.

6.1 Procedure For Preparing Spray Solution

Use the following procedure to mix this product in water alone or when preparing tank mixtures with other labeled products. .

1. Place a 20 to 35 mesh screen or wetting basket over filling port.
2. Through the screen, fill the spray tank one-half full with water and start agitation.
3. Add [INSERT BRAND NAME] herbicide using a circular motion while pouring.
4. If second product is a wettable powder, first make a slurry with the water carrier, then add the slurry SLOWLY through the screen into the tank. Continue agitation.
5. If a flowable formulation is used, premix one part flowable with one part water. Add diluted mixture SLOWLY through the screen into the tank. Continue agitation.
6. If an emulsifiable concentrate formulation is used, premix one part emulsifiable concentrate with two parts water. Add diluted mixture slowly through the screen into the tank. Continue agitation.
7. Continue filling the spray tank with water and add water soluble liquids near the end of the filling process.

When tank mixing [INSERT BRAND NAME] herbicide with other products, maintain good agitation at all times until the contents of the tank are sprayed. If the spray mixture is allowed to settle, thorough agitation is required to resuspend the mixture before spraying is resumed.

Keep by-pass line on or near the bottom of the tank to minimize foaming. Screen size in nozzle or line strainers should be no finer than 50 mesh.

Always predetermine the compatibility of labeled tank mixtures of this product with water carrier by mixing small proportional quantities in advance.

Refer to the "TANK MIXING" section of "GENERAL INFORMATION" for additional precautions.

6.2 Mixing for Hand-Held Sprayers

Prepare the desired volume of spray solution by adding the desired amount of this product as shown in the following table to a clean, empty sprayer. Add the appropriate amount of water and stir or agitate to ensure dissolution of [INSERT BRAND NAME] herbicide. For use in backpack sprayers, it is suggested that the recommended amount of this product be mixed with water in a larger container. Fill sprayer with the mixed solution.

Spray Solution

Desired Volume	Amount of [Insert brand name] herbicide				
	Annuals	Perennials	Brush	Low-Volume, Directed	
1 Gal	1.2 oz	1.5 oz	1.5 oz	4.0 oz	8.0 oz
3 Gal	3.6 oz	4.5 oz	4.5 oz	12.0 oz	1.5 lb
10 Gal	12.0 oz	15.0 oz	15.0 oz	2.5 lb	5.0 lb

6.3 Colorants or Dyes

Agriculturally-approved colorants or marking dyes may be added to this product. Colorants or dyes used in spray solutions of this product may reduce performance, especially at lower rates or dilution. Use colorants or dyes according to the manufacturer's recommendations. Certain blue dyes are not stable in the spray solution in the presence of this product. A jar test to determine if the desired blue dye is stable is recommended. If stability is a problem consider switching to an alternate color dye.

6.4 Drift Control Additives

Drift control additives may be used with all equipment types. When a drift control additive is used, read and carefully observe the cautionary statements and all other information appearing on the additive label.

7.0 APPLICATION EQUIPMENT AND TECHNIQUES

SPRAY DRIFT MANAGEMENT

AVOID DRIFT. EXTREME CARE MUST BE USED WHEN APPLYING THIS PRODUCT TO PREVENT INJURY TO DESIRABLE PLANTS AND CROPS.

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment- and weather-related factors determine the potential for spray drift. The

applicator and the grower are responsible for considering all these factors when making decisions.

Do not apply this product by air.

Do not apply this product through any type of irrigation system.

Do not allow the herbicide solution to mist, drip, drift or splash onto desirable vegetation since minute quantities of this product can cause severe damage or destruction to the crop, plants or other areas on which treatment was not intended.

APPLY THESE SPRAY SOLUTIONS IN PROPERLY MAINTAINED AND CALIBRATED EQUIPMENT CAPABLE OF DELIVERING DESIRED VOLUMES.

7.1 Ground Broadcast Equipment

Use the recommended rates of this product in 10 to 80 gallons of water per acre as a broadcast spray unless otherwise specified. As density of weeds increases, spray volume should be increased within the recommended range to ensure complete coverage. Carefully select proper nozzles to avoid spraying a fine mist. For best results with ground application equipment, use flat fan nozzles. Check for even distribution of spray droplets.

7.2 Hand-Held and High-Volume Equipment

Apply to foliage of vegetation to be controlled. For applications made on a spray-to-wet basis, spray coverage should be uniform and complete. Do not spray to the point of runoff. Use coarse sprays only.

For control of weeds listed in the "ANNUAL WEEDS" section of "WEEDS CONTROLLED", apply a 1.2 ounces of this product per 1 gallon of spray solution. See table in hand-held mixing section for larger mixing volumes.

For best results, use 1.5 ounces of this product per 1 gallon of spray solution on harder-to-control perennials, such as bermudagrass, dock, field bindweed, hemp dogbane, milkweed and Canada thistle. See table in hand held mixing section for larger mixing volumes.

For low-volume, directed spray applications, use 4.0 to 8.0 ounces of this product per 1 gallon of spray solution for control or partial control of brush weeds. See table in hand-held mixing section for larger mixing volumes. Spray coverage should be uniform with at least 50 percent of the foliage contacted. Coverage of the top one half of the plant is important for best results. To ensure adequate spray coverage, spray both sides of brush and tree seedlings when foliage is thick and dense, or where there are multiple sprouts.

7.3 CDA Equipment

The rate of this product applied per acre by controlled droplet application (CDA) equipment must not be less than the amount recommended in this label when applied by conventional broadcast equipment. For vehicle mounted CDA equipment, apply 3-15 gallons of water per acre.

For hand-held CDA units, apply a solution of 1.5 to 2 pounds of this product in one gallon of water at a flow rate of 2 fluid ounces per minute and a walking speed of 0.75 mph.

CDA equipment produces a spray pattern which is not easily visible. Extreme care must be exercised to avoid spray or drift contacting the foliage or any other green tissue of desirable vegetation, as damage or destruction is likely to result.

8.0 SITE AND USE RECOMMENDATIONS

Detailed instructions follow alphabetically, by site.

Unless otherwise specified, applications may be made to control any weeds listed in the annual, perennial and woody brush tables.

8.1 General Noncrop Areas and Industrial Sites

Use in non-crop and non-timber areas only, such as airports, apartment complexes, ditch banks, dry ditches, dry canals, fencerows, golf courses, lumberyards, manufacturing sites, office complexes, parks, parking areas, recreational areas, residential areas, schools, storage areas, warehouse areas, other public areas, and similar industrial and noncrop sites.

This product is **not** for use on crops, timber, or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

General weed control, Trim-and-edge and Bare ground

This product may be used in general noncrop areas. It may be applied with any application equipment described in this label. This product may be used to trim-and-edge around objects in noncrop sites, for spot treatment of unwanted vegetation and to eliminate unwanted weeds growing in established shrub beds or ornamental plantings. This product may be used prior to planting an area to ornamentals, flowers, turfgrass (sod or seed), or prior to laying asphalt or beginning construction projects. This product is **not** for use on plants grown for sale or other commercial use, or for commercial seed production.

Repeated applications of this product may be used, as weeds emerge, to maintain bare ground.

This product may be tank mixed with the following products. Refer to these products' labels for approved noncrop sites and application rates.

BANVEL	PENDULUM WDG
BARRICADE™ 65WG	RONSTAR™ 50WP
DIMENSION™ 4 EC	SURFLAN™
ENDURANCE™	2,4-D
MANAGE®	
PENDIMETHALIN	
PENDULUM™ 3.3 EC	

When applied as a tank mixture for bare ground, **[INSERT BRAND NAME]** herbicide provides control of the emerged annual weeds and control or partial control of emerged perennial weeds.

Dormant turfgrass

This product may be used to control or suppress many winter annual weeds and tall fescue for effective release of dormant bermudagrass and bahiagrass turf. Treat only when turf is dormant and prior to spring greenup. This product is **not** for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Apply 5 to 16 ounces of this product per acre. Apply the recommended rates in 10 to 80 gallons of water per acre. Use only in areas where bermudagrass or bahiagrass are desirable ground covers and where some temporary injury or discoloration can be tolerated.

Treatments in excess of 9 ounces per acre may result in injury or delayed greenup in highly maintained areas, such as golf courses and lawns.

Turfgrass renovation (Except for Commercial Sod Farms)

This product controls most existing vegetation prior to renovating turfgrass areas. This product is not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes. For maximum control of existing vegetation, delay planting or sodding to determine if any regrowth from escaped underground plant parts occurs. Where repeat treatments are necessary, sufficient regrowth must be attained prior to application. Do not use this product for renovation of bermudagrass or kikuyugrass sods. Where existing vegetation is growing under mowed turfgrass management, apply this product after omitting at least one regular mowing to allow sufficient growth for good interception of the spray.

Do not disturb soil or underground plant parts before treatment. Tillage or renovation techniques such as vertical mowing, coring or slicing should be delayed for 7 days after application to allow translocation into underground plant parts.

Desirable turfgrasses may be planted following the above procedures.

Hand-held equipment may be used for spot treatment of unwanted vegetation growing in existing turfgrass.

Do not feed or graze treated turfgrass or feed treated thatch to livestock.

8.2 Parks, Recreational and Residential Areas

This product may be used in parks, recreational and residential areas. It may be applied with any application equipment described in this label. This product may be used to trim-and-edge around trees, fences, paths, around buildings, sidewalks, and other objects in these areas. This product may be used for spot treatment of unwanted vegetation. This product may be used to eliminate unwanted weeds growing in established shrub beds or ornamental plantings. This product may be used prior to planting an area to ornamentals, flowers, turfgrass (sod or seed), or prior to laying asphalt or beginning construction projects.

All of the instructions in the "GENERAL NONCROP AREAS AND INDUSTRIAL SITES" section apply to park and recreational areas. This product is not for use around plants being grown for sale or other commercial use.

9.0 WEEDS CONTROLLED

Always use the higher rate of this product per acre within the recommended range when weed growth is heavy or dense or weeds are growing in an undisturbed (noncultivated) area.

Reduced results may occur when treating weeds heavily covered with dust. For weeds that have been mowed, grazed or cut, allow regrowth to occur prior to treatment.

Refer to the following label sections for recommended rates for the control of annual and perennial weeds. For difficult to control perennial weeds and where plants are growing under stressed conditions, or where infestations are dense, this product may be used at up to 12.25 pounds per acre for enhanced results.

9.1 Annual Weeds

Use 2.25 to 4.5 pounds per acre of this product as a broadcast spray to control annual weeds. When using rates less than 4.5 pounds per acre, the level of fast-burn symptomology may be reduced.

For spray-to-wet applications, apply 1.2 ounces of this product per 1 gallon of spray solution.

WEED SPECIES

Annoda, spurred
Barley*
Barnyardgrass*
Bittercress*
Black nightshade*
Bluegrass, annual*
Bluegrass, bulbous*
Bassia, fivehook
Brome, downy*
Brome, Japanese*
Browntop panicum*
Buttercup*
Carolina foxtail*
Carolina geranium
Castor bean
Cheatgrass*
Cheeseweed (*Malva parviflora*)
Chervil*
Chickweed*
Cocklebur*
Copperleaf, hophornbeam
Corn*
Corn speedwell*
Crabgrass*
Dwarf dandelion*
Eastern manna grass*
Eclipta*
Fall panicum*
Falsedandelion*
Falseflax, smallseed*
Fiddleneck
Field pennycress*
Filaree
Fleabane, annual*
Fleabane, hairy (*Conyza bonariensis*)*
Fleabane, rough*
Florida pusley
Foxtail*
Goatgrass, jointed*
Goosegrass
Grain sorghum (milo)*
Groundsel, common*
Hemp sesbania
Henbit
Horseweed/Marestail (*Conyza canadensis*)
Itchgrass*
Johnsongrass, seedling
Junglerice
Knotweed

Kochia
 Lambsquarters*
 Little barley*
 London rocket*
 Mayweed
 Medusahead*
 Morningglory (*Ipomoea spp.*)
 Mustard, blue*
 Mustard, tansy*
 Mustard, tumble*
 Mustard, wild*
 Oats
 Pigweed*
 Plains/Tickseed coreopsis*
 Prickly lettuce*
 Purslane, common
 Ragweed, common*
 Ragweed, giant
 Red rice
 Russian thistle
 Rye*
 Ryegrass*
 Sandbur, field*
 Shattercane*
 Shepherd's-purse*
 Sicklepod
 Signalgrass, broadleaf*
 Smartweed, ladythumb*
 Smartweed, Pennsylvania*
 Sowthistle, annual
 Spanishneedles
 Speedwell, purslane*
 Sprangletop*
 Spurge, annual
 Spurge, prostrate*
 Spurge, spotted*
 Spurry, umbrella*
 Starthistle, yellow
 Stinkgrass*
 Sunflower*
 Teaweed/ Prickly sida
 Texas panicum*
 Velvetleaf
 Virginia copperleaf
 Virginia pepperweed*
 Wheat*
 Wild oats*
 Witchgrass*
 Woolly cupgrass*
 Yellow rocket

*When using field broadcast equipment (boom sprayers using flat fan nozzles) these species will be controlled or partially controlled using 4.5 pound of this product per acre. Applications must be made using 10 to 80 gallons of carrier volume per acre. Use nozzles that ensure thorough coverage of foliage and treat when weeds are in an early growth stage.

9.2 Perennial Weeds

Best results are obtained when perennial weeds are treated after they reach the reproductive stage of growth (seedhead initiation in grasses and bud formation in broadleaves). For non-flowering plants, best results are obtained when the plants reach a mature stage of growth. In many situations, treatments are required prior to these growth stages. Under these conditions, use the higher application rate within the recommended range.

Use 4.5 to 9.0 pounds per acre of this product as a broadcast spray to control perennial weeds. When using rates less than 9.0 pounds per acre, the level of fast-burn symptomology may be reduced.

For spray-to-wet applications, apply a 1.5 ounces of this product per 1 gallon of spray solution. Ensure thorough coverage when using spray-to-wet treatments using hand-held equipment.

When using hand-held equipment for low-volume directed spot treatments, apply 4.0 to 8.0 ounces of this product per 1 gallon of spray solution.

Allow 7 or more days after application before tillage.

Weed Species

Alfalfa*
Alligatorweed*
Anise (fennel)
Bahiagrass
Beachgrass, European (*Ammophila arenaria*)
Bentgrass*
Bermudagrass*
Bermudagrass, water (knotgrass)
Bindweed, field
Bluegrass, Kentucky
Blueweed, Texas
Bromegrass, smooth
Bursage, woolly-leaf
Canarygrass, reed
Cattail
Clover, red, white*
Cogongrass
Dallisgrass
Dandelion
Dock, curly
Dogbane, hemp
Fescue (except tall)
Fescue, tall
German ivy
Guineagrass
Horsenettle
Horseradish
Iceplant
Jerusalem artichoke
Johnsongrass

Kikuyugrass*
Knapweed
Lantana
Lespedeza
Milkweed, common
Muhly, wirestem
Mullein, common
Napiergrass
Nightshade, silverleaf
Nutsedge; purple, yellow
Orchardgrass
Pampasgrass
Paragrass
Pepperweed, perennial
Phragmites*
Poison hemlock
Quackgrass
Redvine*
Reed, giant
Ryegrass, perennial
Spurge, leafy*
Thistle, artichoke
Thistle, Canada
Timothy
Torpedograss*
Trumpet creeper*
Vaseygrass
Velvetgrass
Wheatgrass, western

*Partial control

9.3 Brush Weeds and Tree Seedlings

Best results are obtained when brushweeds are treated when they are in the seedling stage of growth. In many situations, re-treatment is required on larger plants. Under these conditions, use the higher application rate within the recommended range.

Use 9.0 pounds per acre of this product as a broadcast spray to control brush weeds.

For spray-to-wet applications, apply a 1.5 ounces of this product per 1 gallon of spray solution. Ensure thorough coverage when using spray-to-wet treatments using hand-held equipment.

When using hand-held equipment for low-volume directed spot treatments, apply 4.0 to 8.0 ounces of this product per 1 gallon of spray solution.

Allow 7 or more days after application before tillage.

Weed Species

Alder
Ash*
Beech*
Birch
Blackberry

Blackgum
Cherry; bitter, black, pin
Dogwood*
Elderberry
Elm*
Honeysuckle
Locust, black*
Maple, red
Maple, sugar
Oak, black*
Oak, post
Oak, northern pin
Oak, red
Oak, scrub*
Oak, southern red
Oak, white*
Peppertree, Brazilian (Florida holly)*
Pine
Poison ivy*
Poison oak*
Poplar, yellow*
Redbud, eastern
Rose, multiflora
Saltcedar*
Sumac; laurel, poison, smooth, sugarbush, winged*
Sweetgum
Vine maple*
Virginia creeper
Waxmyrtle, southern*

* Partial Control

10.0 LIMIT OF WARRANTY AND LIABILITY

Monsanto Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in the Complete Directions for Use label booklet ("Directions") when used in accordance with those Directions under the conditions described therein. **NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE.** This warranty is also subject to the conditions and limitations stated herein.

Buyer and all users shall promptly notify this Company of any claims whether based in contract, negligence, strict liability, other tort or otherwise.

Buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those set forth in the Directions, application to or contact with desirable vegetation, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the product is applied, as well as weather conditions which are outside the application ranges set forth in the Directions, application in any manner not explicitly set forth in the Directions, moisture conditions outside the moisture range specified in the Directions, or the presence of products other than those set forth in the Directions in or on the soil, crop or treated vegetation.

This Company does not warrant any product reformulated or repackaged from this product except in accordance with this Company's stewardship requirements and with express written permission from this Company.

THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF THE LIABILITY OF THIS COMPANY OR ANY OTHER SELLER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY OTHER SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

Upon opening and using this product, buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement. If terms are not acceptable, return at once unopened.

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Surflan is a trademark of Dow Agrosciences .

Barricade and Endurance are trademarks of Novartis Corporation.

Ronstar is a trademark of Aventis, Inc.

Banvel and Pendulum are trademarks of BASF Ltd.

EPA Reg. No. 524-535

In case of an emergency involving this product,
Call Collect, day or night, (314) 694-4000.

©2004 MONSANTO COMPANY
ST. LOUIS, MISSOURI, 63167 U.S.A.

GI 1 1512141-1 1513151 1 05/10/00

1. DATE REVIEWED 4/14/00		2. DATE REVIEWED		3. ACTION TYPE Reduce PPE with changes		4. REVIEWED BY		5. REVIEWED BY	
6. METHOD OF SUPPORT <input type="checkbox"/> 1A <input type="checkbox"/> 1B <input type="checkbox"/> 1C		7. PRODUCT MANAGER		8. PRODUCT MANAGER		9. PRODUCT MANAGER		10. PRODUCT MANAGER	
11. REVIEW TYPE		12. REVIEW CODE		13. SIGNATURE OF REVIEWER		14. COMMENT CODE		15. DATE REVIEW COMPLETED	
A. REVIEWABILITY TEAM		1							
B. PRODUCT MANAGER TEAM EFFICIENCY REVIEW		1							
C. PRODUCT MANAGER TEAM HUMAN SAFETY REVIEW		1							
D. PRODUCT MANAGER TEAM ENVIRONMENTAL SAFETY REVIEW		1							
E. PRODUCT MANAGER TEAM REDUCTION REVIEW		1		UKW RL					
F. PRODUCT MANAGER		1		reduced PPE-glove etc ok					
G. INTERAGENCY REFERRAL		1		need change in Wincity RC					
H. COST-BENEFIT REVIEW		1		inhalation issue to					
I. PUBLIC COMMENT REVIEW		1		be addressed later					
J. USE BRANCH INSTRUCTIONS		1							
K. USE BRANCH MEDICINE		1							
L. USE BRANCH FUNDING		1							
M. USE BRANCH IDENTIFICATION		1							
N. USE BRANCH IMPROVEMENT		1							
O. EMERGENCY BRANCH REMOVE CHEMISTRY		1							
P. USE BRANCH CHANGES - CHEMICAL CHEMISTRY		1							
Q. VERIFICATION BRANCH HUMAN SAFETY		1							
R. USE BRANCH CHANGES - HUMAN SAFETY		1							
S.		1							
T.		1							
PRODUCT MANAGER SIGNATURE				TYPE OF RESPONSE				DATE	



Jim Tompkins/DC/USEPA/US

06/16/2006 06:22 AM

To Vickie Walters/DC/USEPA/US@EPA

cc

bcc

Subject Fw: QuikPRO (diquat) PPE modification

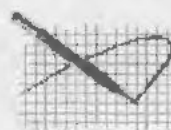
Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Phone 703 305 5697

Fax 703 308 0029

E-mail Tompkins.jim@EPA.GOV

----- Forwarded by Jim Tompkins/DC/USEPA/US on 06/16/2006 06:22 AM -----



Richard
Loranger/DC/USEPA/US

06/16/2006 12:12 AM

To Dan Kenny/DC/USEPA/US@EPA, Jim
Tompkins/DC/USEPA/US@EPA

cc

George Herndon/DC/USEPA/US@EPA, Christina
Swartz/DC/USEPA/US@EPA

Subject QuikPRO (diquat) PPE modification

Dan, Jim,

This message addresses the request from Monsanto Company to modify the personal protective equipment (PPE) on the label of MON 78365 Herbicide (also called QuikPRO Herbicide)(Reg. No. 524-535). The action was sent to HED with Decision Number 344884 and DP# 328043. The PPE specified on the approved label include coveralls over short-sleeved shirt and short pants, chemical resistant gloves, protective footwear plus socks, and protective eyewear. The requested changes in PPE are (1) replacement of the coveralls over short-sleeved shirt and shorts with long-sleeved shirt and pants and (2) elimination of the gloves. Taking into account the acute toxicities of this granular end-use product (all tox category III or IV with a negative classification for dermal sensitization [10/10/01 Byron Backus memo]) and HED's assessment of diquat exposures based on biomonitoring studies (Tom Brennan, 2/7/02, D279612), HED concludes that the requested PPE revisions for QuikPRO Herbicide will not significantly increase handler risks to a level of concern. A more detailed memo to explain how we reached this conclusion will be issued within six weeks.

Please note that the proposed label change has been assessed from the perspective of only diquat exposure. This product also includes glyphosate as an active ingredient. RD needs to ensure that the PPE modifications are not of concern with regard to exposures and risks from the glyphosate component of the formulation.

Rick



Jim Tompkins/DC/USEPA/US

06/13/2006 03:14 PM

To Vickie Walters/DC/USEPA/US@EPA

cc

bcc

Subject Fw: DIQUAT STATUS (524-535)

Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Phone 703 305 5697

Fax 703 308 0029

E-mail Tompkins.jim@EPA.GOV

----- Forwarded by Jim Tompkins/DC/USEPA/US on 06/13/2006 03:13 PM -----



Richard
Loranger/DC/USEPA/US

06/13/2006 02:10 PM

To Jim Tompkins/DC/USEPA/US@EPA

swartz.christina@epa.gov, George

cc Hemdon/DC/USEPA/US@EPA, Dan

Kenny/DC/USEPA/US@EPA

Subject Re: DIQUAT STATUS (524-535) [1]

Jim,

It appears that the word has not gotten to you for some reason, but we (HED) are requesting that the PRA date be extended. After spending three days reviewing the registrant's risk assessment plus some of the earlier HED memos, I came to the conclusion there could be inhalation risks of concern and we needed to reexamine those previous HED risk assessments. I know that Jeff Hemdon talked to Lois last week about this, but don't know if Christina has sent anything to you or Dan Kenny. As HED management is usually tied up most of Tuesday afternoon with staff meeting, I am taking the liberty of forwarding most of my message of last week to Christina and Jeff where I spelled out my findings. I hope you can take some of this message to create whatever is needed for a PRA extension request.

Rick

Here is the meat of my message last week to Jeff and Christina:

"The specific action sent for our review is Monsanto's request to reduce the PPE (i.e., remove the requirement for gloves) on the product QuikPRO herbicide, a water soluble granule which is mostly glyphosate (73% IPA salt) with a much lower percent (2.9%) of diquat dibromide. The uses are primarily on turf (golf courses, parks, residences). Monsanto submitted their own occupational/residential risk assessment in the package. This assessment shows dermal MOE's of 300 or more, while several inhalation MOE's are borderline (116 and 138). The difficulty in interpreting their assessment is that they mixed residential "PPE" (i.e., short sleeves, short pants) with occupational criteria for amount treated per day. This should be overly conservative for at least the occupational dermal exposures, but the situation is further complicated by the fact that we can not figure out how they derived many of the unit exposures. They claim to be using the ORETF studies for several scenarios, but Jack and I could not find similar unit exposures in our reviews of the ORETF data. Their inhalation assessment is less likely to be overly conservative, so the marginal MOE's raise some concerns, especially in light of the biomonitoring data (see next paragraph). As a result, we believe that HED needs to do our own complete risk assessment from scratch for this granular product using our own unit exposures and assumptions of acres per day. Although the registrant's letter claims the product is intended for professional applicators, the label does

not clearly exclude residential applications, so assessment of homeowner exposure also should be addressed.

"In addition to trying to make sense of Monsanto's assessment of risk from their granular product, I also looked back at the assessments done by Tom Brennan in late 2001/early 2002. These assessments addressed liquid products (as opposed to the present water soluble granule). Initially Tom assessed only residential exposures in the context of the TRED, but later looked at occupational risks when Syngenta requested some reductions in PPE. The residential handler risks were not of concern with the lowest MOE's being about 300 for both dermal and inhalation exposures. Note that I found one error in his latest assessment for the hose end sprayer (lb ai per gallon multiplied by acres per day instead of gallons per day). Considering that the dermal exposure is now considered to be 0.3% instead of the 4.1% that Tom used, I think the MOE is still not of concern although I have not done the actual calculation. For occupational risks, he did not use the PHED approach, but relied upon two biomonitoring studies (one diquat and one paraquat). Trying to link the present action for turf uses to this biomonitoring data is problematic. The diquat study appears appropriate from the application perspective (knapsack sprayers to bananas), but included gloves as part of the PPE (versus the present request to remove gloves). The paraquat study had some individuals with minimal or no PPE, but involved monitoring ground boom applicators, who are expected to have lower exposures than some of the scenarios for the QuikPRO uses on turf. On top of those differences, there appears to be a potential for significant inhalation risk based on the biomonitoring data. If one compares the total absorbed doses in these two studies to the dermal endpoint (1.0 mg/kg/day based on oral study), the MOE's are 1100 and 1200. However, if one assumes all the absorbed dose came from inhalation (0.024 mg/kg/day endpoint based on inhalation study), the MOE is 28. While this is almost certainly an overestimate of the inhalation component, the diquat study involved extensive PPE to reduce dermal exposure so that inhalation exposure could have been a relatively high percentage of the total exposure. Tom did not show a calculation of an MOE for inhalation exposure. The footnote to his table states that if one assumes 100% of the dose comes from inhalation and then compares the dose to the appropriate inhalation toxic endpoint, the MOEs are lower than those from the dermal perspective but not a risk of concern. At this point I do not understand how he came to that conclusion. Depending upon our completion of a PHED-type inhalation exposure assessment for various diquat uses, does this indicate the need for some chemical specific inhalation exposure data? This is certainly not an issue for just the Monsanto product, but the Syngenta diquat products as well. Therefore, this could impact the conclusions drawn in the TRED."

Jim Tompkins/DC/USEPA/US



Jim
Tompkins/DC/USEPA/US
06/12/2006 03:36 PM

To: Richard Loranger/DC/USEPA/US@EPA

cc:

Subject: Fw: 524-535

What is the status of the review of the reduction in the PPE for 524-535?

Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Phone 703 305 5697

Fax 703 308 0029

E-mail Tompkins.jim@EPA.GOV

----- Forwarded by Jim Tompkins/DC/USEPA/US on 06/12/2006 03:33 PM -----



Jim
Tompkins/DC/USEPA/US
05/25/2006 06:29 AM

To Richard Loranger/DC/USEPA/US
cc
Subject Re: 524-535 [1]

If HED is willing to accept the reduction in PPE, we would like to receive the review by June 8. If HED is not likely to accept the reduction in the PPE, I need a heads up as soon as possible.

Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Phone 703 305 5697

Fax 703 308 0029

E-mail Tompkins.jim@EPA.GOV

Richard Loranger/DC/USEPA/US



Richard
Loranger/DC/USEPA/US
05/24/2006 01:13 PM

To Jim Tompkins/DC/USEPA/US@EPA
cc swartz.christina@epa.gov
Subject Re: 524-535 [1]

Jim,

What is the latest date for you to receive our review in order for you to make the PRIA date?

Rick

Jim Tompkins/DC/USEPA/US



Jim
Tompkins/DC/USEPA/US
05/24/2006 07:51 AM

To Richard Loranger/DC/USEPA/US@EPA
cc
Subject 524-535

I was checking on the status of the review of DP 344884 for 524-535 a reduction in PPE for a product containing diquat. We have a PRIA due date of June 19 and want to confirm that the review is on track to allow us to meet this date.

Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Phone 703 305 5697
Fax 703 308 0029
E-mail Tompkins.jim@EPA.GOV

MONSANTO



MONSANTO COMPANY

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March 10, 2006

Document Processing Desk
Registration Division – H7505C
U.S. Environmental Protection Agency
1801 South Bell Street
Crystal Mall #2, Room 266A
Arlington, Virginia 22202-4501

Attention: Mr. James A. Tompkins
Product Manager 25

Subject: Response to EPA meeting February 27, 2006

Re: Additional Information to Support Proposed Amendment to Master Label EPA
Reg. No. 524-535 for Reduction of Personal Protective Equipment (PPE)
Requirement

Dear Mr. Tompkins:

Thank you for meeting with Monsanto regarding our June 2, 2004 data submission, MRID 46291001, DP Barcode D305484, requesting reduction in the required PPE for QuikPRO herbicide. In accordance with the Agency request for clarification, the following relates to our discussion.

EPA Reg. No. 524-535, base brand name MON 78365 herbicide; alternate brand name QuikPRO herbicide, is a water-soluble granular formulation containing 73.3% of the ammonium salt of glyphosate and 2.9% of the dibromide salt of diquat. According to the current CSF, dated July 19, 2002, the sources for the formulation active ingredients are MON 8750 herbicide, 95.2% ammonium glyphosate, and [REDACTED] diquat dibromide.

The acute toxicology for MON 78365 herbicide:

<u>Study Type</u>	<u>Results</u>	<u>EPA Toxicity Category</u>
Acute Oral Toxicity	LD50 = 4443 mg/kg	III
Acute Dermal Toxicity	LD50 > 5000 mg/kg	IV
Acute Inhalation Toxicity	LC50 > 0.99 mg/L	III
Eye Irritation	Moderately Irritating	III
Skin Irritation	Slightly Irritating	IV
Sensitization	Negative	Negative

Based solely on the EPA toxicity categories, the personal protective equipment for this product would be long-sleeved shirt and long pants, shoes plus socks.

One pound of QuikPRO herbicide contains 0.75 pound of the ammonium salt of glyphosate and 0.03 pound of the dibromide salt of diquat. It is intended for use by professional applicators for weed control in industrial and residential non-agricultural use areas.

The product is diluted with water and typical spray solution concentrations range from 1.2 ounces per gallon for hand-held sprayers to 0.9 to 15 ounces per gallon for broadcast spray equipment. The maximum typical use rate for QuikPRO herbicide would be 9 pounds of product per acre which equates to 0.261 pound per

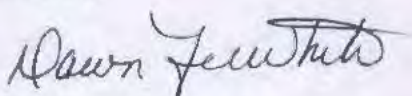
Product ingredient source information may be entitled to confidential treatment

pound per acre of diquat dibromide. Use rates for QuikPRO herbicide are described in detail in MSL-19290, MRID 46291001, which provides additional information on the applicator exposure assessment for diquat dibromide as formulated into a granule in QuikPRO herbicide. The results for mixing and loading of the granular product as well as backpack and other applications of the dilute spray solution indicate that all MOE exceeded the safety factor of 100. The results of the submitted assessment indicate that even with very conservative assumptions applied to all application scenarios relevant to the use of the dry product, QuikPRO herbicide, there should be no need for coveralls and chemical resistant gloves as PPE. The revised PPE statement included in the proposed label is as follows: Long-sleeved shirt and long pants, protective footwear plus socks and protective eyewear, which is more restrictive than the Worker Protection requirements based on the toxicity of QuikPRO herbicide.

Monsanto respectfully requests that the agency and HED reconsider the request to reduce the Personal Protective Equipment (PPE) for QuikPRO herbicide. The changes originally requested are being provided and indicated on the attached master label utilizing redline and strikeout of the specific changes. Monsanto has also included a copy of the approved CSF dated July 19, 2002. Please note too that at the time of the original label proposal, June 2, 2004, Monsanto also requested a slight modification of the rate description in the Annual Weeds and Perennial Weeds sections to include a minimum recommended rate and provided clarification on what symptomology may be observed at the lower use rates in the range. Monsanto also modified the Storage and Disposal language consistent with the standard language on other products though the bulk and refillable container instructions would not be applicable to this dry formulation

If you should have any questions regarding this submission, please call Dr. Russell P. Schneider at (202) 383-2866 or call me at (314) 694-6576.

Sincerely,



Dawn Fee-White
Registration Manager

Cc: Russ Schneider
Rick Loranger – EPA

Attachments:
revised label, approved CSF, MSL 19290, EPA Product Chemistry and Acute Toxicology Review



**Recommendation of Division Directors
Negotiated Due Dates**

Decision#: 334884		Registration#: 524-535	
Fee Category: R-35		PRIA Decision Time Frame: 16 Months	
Submitted by: Vickie Walters		Branch: Herbicide	Date: 2/9/06
Company: Monsanto			
Original Due Date: February 19, 2006		Proposed New Due Date: June 19, 2006	
Previous Negotiated Due Dates: None			
<p>Issue (describe in detail): Monsanto requested the removal of coveralls and gloves from the Personal Protective Equipment required for this product. On January 17, 2006, HED sent the Herbicide Branch a draft review requiring that coveralls and gloves remain on the label. The results of this review were forwarded to the registrant.</p>			
<p>Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates):</p> <p>When the results of HED's review were forwarded to the Company, Monsanto requested a meeting with HED to discuss the PPE issue. From the dates proposed by the registrant, we scheduled a meeting on February 27, 2006 with HED and the Company. Since the meeting is scheduled to occur after the PRIA Due Date of February 19, 2006, the Agency requested Monsanto to renegotiate the PRIA Due Date.</p>			
<p>Rationale for Proposed Due Date:</p> <p>We proposed a renegotiated due date of June 19, 2006 to permit HED time to review any new information presented by the Monsanto in the meeting, complete a review, and for RD to make a final decision on the action.</p>			
Other Comments:			
Approved: ✓		Disapproved:	
If disapproved, action to be taken:			
OD or DOD Signature:		2-10-06	



"SCHNEIDER, RUSSELL P
[AG/1920]"
<russell.p.schneider@monsanto.com>

02/09/2006 10:03 AM

To Jim Tompkins/DC/USEPA/US@EPA, Vickie
Walters/DC/USEPA/US@EPA

cc

bcc

Subject EPA Reg. No. 524-535

History:

✉ This message has been replied to.

Jim/Vickie;

Since we have scheduled a meeting for February 27 to discuss the PPE related to EPA Reg. No. 524-535, and you have a PRIA schedule date to meet, Monsanto agrees that a new PRIA date is necessary in order to provide EPA sufficient time to meet with Monsanto, review the data we present and make a final decision on the action. Therefore we agree that the decision time can be moved to June 2006.

Russ

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MEMORANDUM

Date: December 27, 2005

Subject: Assessing Monsanto's Request to Modify Diquat Dibromide Label Requirements.
PC Code: 032201 DP Barcode: D305484
PRIA Action Code: R35

To: James Tompkins, RM 25
Registration Division/Fungicide Branch (7505C)

From: Shih-Chi Wang, Biologist *Shih-Chi Wang*
Health Effects Division/Registration Action Branch 2 (7509C)

Thru: Richard Loranger, Branch Senior Scientist *R. Loranger*
Health Effects Division/Registration Action Branch 2 (7509C)

The enclosed document is an assessment of Monsanto's request (a letter to the Office of Pesticide Programs dated 6/2/04) for the proposed change to require Personal Protective Equipment (PPE) during the handling and application of diquat dibromide. In this document, HED presents the results of its regulatory review of both occupational and residential exposures to diquat dibromide that directly respond to Monsanto's request to change the PPE requirement.

1.0 The Monsanto's Request and Supporting Study

Monsanto is requesting a reduction in the current PPE requirement for applicators and other handlers, removing both coveralls and chemical resistant gloves. The revised PPE statement included in the proposed label is as follows: long-sleeved shirt and long pants, protective footwear plus socks and protective eyewear.

The study Monsanto submitted to the EPA (MRID # 462910-01) indicates that all their MOEs exceeded the required safety factor of 100. The company therefore suggested that the risk associated with the professional residential use of diquat as in QuikPRO herbicide is acceptable even without the implementation of specific PPE.

2.0 Documents Reviewed

- (1) MRID # 462910-01: Residential Applicator Exposure Assessment for Diquat Dibromide as Formulated and Used in QuikPRO Herbicide. 4/23/04.
- (2) Proposed Label for EPA Reg. #524-535, MON 78365 Herbicide and QuikPRO Herbicide.
- (3) D281890: Diquat Dibromide; HED Risk Assessment for Tolerance Reassessment Eligibility Document (TRED). 3/25/02.
- (4) D279507: Residential Exposure Assessment—A Recommendations for the TRED Document for Diquat Dibromide. 12/14/01.
- (5) D281634: Re-characterization of Risk for the Diquat Dibromide TRED Based on New Dermal Absorption Data. 3/13/02.
- (6) D281011: Assessing Syngenta's Request to Modify Diquat Dibromide Label Requirements. 2/14/02.

3.0 Current Understanding

3.1 Previous Request to Modify Diquat Dibromide Label

On 10/14/99, Syngenta Company requested a modification of diquat dibromide label to reduce PPE for all product uses. On 2/14/02 after reviewing Syngenta's requested, EPA recommended following PPE requirements (in D281011 document):

1. Mixer/loaders for groundboom and backpack applications must wear a face shield;
2. Mixer/loaders must wear chemical resistant gloves;
3. Coverall over a single layer of clothes (short pants and short-sleeved t-shirts) must be worn by all workers;
4. Protective footwear must be worn by all workers.

3.2 Toxicity Concerns

Following toxicity data are presented in the D281890 document:

The toxicological endpoint for the short-term dermal exposure duration (1 day to 1 month) is based on an oral NOAEL of 1 mg/kg/day. The effect observed was maternal body-weight loss and decreased food consumption during dosing [gestation days 7-10] at the LOAEL of 3 mg/kg/day. The study selected was a developmental toxicity study on rabbits – MRID number 41198901. The toxicological endpoint selected for the inhalation route (any time period) is NOAEL of 0.1 µg/L based on increased lung weights and microscopic lesions in the lungs at the LOAEL of 0.49 µg/L. For both inhalation and dermal exposures, the uncertainty factor of 100 is the target MOE.

Diquat dibromide is not acutely toxic *via* the oral [Toxicity Category III] and inhalation [Toxicity Category III] routes of exposure but is moderately-to-severely toxic *via* the dermal [Toxicity Category II] route of exposure. Diquat dibromide is not a skin irritant [Toxicity Category IV] nor a dermal sensitizer, but it is considered a moderate-to-severe eye irritant [Toxicity Category II]. Acute toxicity data on diquat dibromide are summarized in Table 1.

Table 1: Acute Toxicity Data on Diquat Dibromide.

Guideline No.	Study Type	MRID #(S)	Results	Toxicity Category
870.1100	Acute Oral	00081506	*rat LD ₅₀ = 810 mg/kg ♂	III
		00092882	*rat LD ₅₀ = 600 mg/kg ♀	II
		00092882	rabbit LD ₅₀ = 190 mg/kg rat LD ₅₀ = 400-440 mg/kg	II
870.1200	Acute Dermal	00100614	*rabbits LD ₅₀ = 262 mg/kg ♂ *rabbits LD ₅₀ = 315 mg/kg ♀	II
		00061634	*rabbits LD ₅₀ = 288.5 mg/kg ♂+♀ rat LD ₅₀ = 50-100 mg/kg	I
870.1300	Acute Inhalation	26385 J	*rat LC ₅₀ = 0.80 mg/L ♂ *rat LC ₅₀ = 1.09 mg/L ♀ *rat LC ₅₀ = 0.97 mg/L ♂+♀	III
870.2400	Primary Eye Irritation	00081507	*rabbit slight to severe eye irritant	II
870.2500	Primary Skin Irritation	00107903	*slight irritation	IV
870.2600	Dermal Sensitization	00107903	not a dermal sensitizer	N/A
870.6200	Acute Neurotoxicity	42666801	NOAEL = 75 mg/kg/day	N/A

J Accession No.; *values are expressed in terms of the test material [Diquat Water Weed Killer] and not in terms of the Diquat ion.

3.3 Incident Report

Following incident report is included in the D281011 document:

There was an incident report for a worker using backpack sprayer to apply diquat to turf. Manoguerra (1990) reported on a 51-year-old Mexican male pesticide applicator who applied diquat to grasses using a hand pumped backpack sprayer. The only protective clothing worn by the patient was a pair of rubber boots. The sprayer leaked and "thoroughly saturated the patient's jacket, pants and allowed the herbicide to accumulate in the boots. The patient sprayed 30 to 33 tanks [each holding 20 liters] of herbicide [dilution not reported] following which he went home and bathed. During the night he awoke with a burning sensation on the bottom of his right foot. The next day, the patient used the same boots and noted that he had to dry them out with a cloth before putting them on." He continued working till noon when his feet became extremely painful and he washed his feet and performed other duties. The following day he was taken to the emergency department. The burns to his feet were determined to be full thickness and required intensive treatment including skin grafts. One week after the grafts were placed the patient was discharged from the hospital, though pain in the feet persisted for several months. The tenderness on his lower feet prevented him from standing for more than half an hour at a time and prevented him from returning to work. The author, director of the San Diego Regional Poison Center, complained in his discussion that the label implies that "the primary concern is absorption of the material through an abrasion, skin cut or area of irritation leading to system poisoning. The label states that the product 'causes skin irritation'." Dr. Manoguerra went on to recommend "it would seem prudent to include a statement on the product label to warn against improper clothing that allow seepage. The warnings should be strengthened to include the fact that prolonged contact of the product with the skin may produce burns." The Health Effects Division (HED) concurs with this recommendation. HED realizes that this incident represents a severe equipment failure resulting in what was likely a very large exposure to diquat.

4.0 Recommendations

As indicated in the D281011 document, HED does acknowledge that in all cases, the calculated MOEs showed no risk of concern for diquat dibromide. However, other factors such as acute toxicity and incident reports are also considered in the risk assessment.

Based on the acute toxicity (Category I & II for acute dermal toxicity), incident report (skin burns), and previous decision for the modification of PPE requirement (mixer/loaders must wear chemical resistant gloves & all workers must wear coverall over a single layer of clothes), HED would recommend NOT to change current PPE requirement on diquat dibromide.

CC: RAB2 RF, S. Wang



Jim Tompkins/DC/USEPA/US

01/17/2006 06:24 AM

To Vickie Walters/DC/USEPA/US@EPA

cc

bcc

Subject Fw: Review of DP 305484 for 524-535

Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Phone 703 305 5697

Fax 703 308 1825

E-mail Tompkins.jim@EPA.GOV

----- Forwarded by Jim Tompkins/DC/USEPA/US on 01/17/2006 06:23 AM -----



Christina
Swartz/DC/USEPA/US

01/13/2006 04:27 PM

To Jim Tompkins/DC/USEPA/US@EPA

cc

Subject Re: Review of DP 305484 for 524-535

Jim,

Here's the draft memo, which Shih-Chi has sent to Rick Loranger for final signature.

Christina



D305484.mem.wpd

Christina Swartz
US EPA, Office of Pesticide Programs
Health Effects Division
Phone: 703 305 5877
Fax: 703 305 5147

e-mail: Swartz.Christina@epa.gov
Jim Tompkins/DC/USEPA/US



Jim Tompkins/DC/USEPA/US

01/10/2006 07:02 AM

To Christina Swartz/DC/USEPA/US@EPA

cc

Subject Review of DP 305484 for 524-535

I would like to find out the status of the review of DP 305484 under Decision 344884. The last Science Due Date was 10/22/05. We have a PRIA Due Date of 2/19/06 and we have not received a review.

Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Phone 703 305 5697
Fax 703 308 1825
E-mail Tompkins.jim@EPA.GOV



Jim Tompkins/DC/USEPA/US

02/23/2006 02:08 PM

To Vickie Walters/DC/USEPA/US@EPA

cc

bcc

Subject Fw: diquat PPE memo

Jim Tompkins
Team Leader 25
Herbicide Branch
Registration Division

Phone 703 305 5697

Fax 703 308 1825

E-mail Tompkins.jim@EPA.GOV

----- Forwarded by Jim Tompkins/DC/USEPA/US on 02/23/2006 02:07 PM -----



Richard
Loranger/DC/USEPA/US

02/23/2006 02:00 PM

To Jim Tompkins/DC/USEPA/US@EPA

cc Shih-Chi Wang/DC/USEPA/US@EPA,
swartz.christina@epa.gov

Subject diquat PPE memo

Jim,

In light of Monday's meeting with the registrant, here is the final document for the requested PPE changes on diquat.

Rick



D305484.mem.wpd



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MEMORANDUM

Date: December 27, 2005

Subject: Assessing Monsanto's Request to Modify Diquat Dibromide Label Requirements.
PC Code: 032201 DP Barcode: D305484
PRIA Action Code: R35

To: James Tompkins, RM 25
Registration Division/Fungicide Branch (7505C)

From: Shih-Chi Wang, Biologist
Health Effects Division/Registration Action Branch 2 (7509C)

Thru: Richard Loranger, Branch Senior Scientist
Health Effects Division/Registration Action Branch 2 (7509C)

The enclosed document is an assessment of Monsanto's request (a letter to the Office of Pesticide Programs dated 6/2/04) for the proposed change to require Personal Protective Equipment (PPE) during the handling and application of diquat dibromide. In this document, HED presents the results of its regulatory review of both occupational and residential exposures to diquat dibromide that directly respond to Monsanto's request to change the PPE requirement.

1.0 The Monsanto's Request and Supporting Study

Monsanto is requesting a reduction in the current PPE requirement for applicators and other handlers, removing both coveralls and chemical resistant gloves. The revised PPE statement included in the proposed label is as follows: long-sleeved shirt and long pants, protective footwear plus socks and protective eyewear.

The study Monsanto submitted to the EPA (MRID # 462910-01) indicates that all their MOEs exceeded the required safety factor of 100. The company therefore suggested that the risk associated with the professional residential use of diquat as in QuikPRO herbicide is acceptable even without the implementation of specific PPE.

2.0 Documents Reviewed

- (1) MRID # 462910-01: Residential Applicator Exposure Assessment for Diquat Dibromide as Formulated and Used in QuikPRO Herbicide. 4/23/04.
- (2) Proposed Label for EPA Reg. #524-535, MON 78365 Herbicide and QuikPRO Herbicide.
- (3) D281890: Diquat Dibromide; HED Risk Assessment for Tolerance Reassessment Eligibility Document (TRED). 3/25/02.
- (4) D279507: Residential Exposure Assessment--A Recommendations for the TRED Document for Diquat Dibromide. 12/14/01.
- (5) D281634: Re-characterization of Risk for the Diquat Dihromide TRED Based on New Dermal Absorption Data. 3/13/02.
- (6) D281011: Assessing Syngenta's Request to Modify Diquat Dibromide Label Requirements. 2/14/02.

3.0 Current Understanding

3.1 Previous Request to Modify Diquat Dibromide Label

On 10/14/99, Syngenta Company requested a modification of diquat dibromide label to reduce PPE for all product uses. On 2/14/02 after reviewing Syngenta's requested, EPA recommended following PPE requirements (in D281011 document):

1. Mixer/loaders for groundboom and backpack applications must wear a face shield;
2. Mixer/loaders must wear chemical resistant gloves;
3. Coverall over a single layer of clothes (short pants and short-sleeved t-shirts) must be worn by all workers;
4. Protective footwear must be worn by all workers.

3.2 Toxicity Concerns

Following toxicity data are presented in the D281890 document:

The toxicological endpoint for the short-term dermal exposure duration (1 day to 1 month) is based on an oral NOAEL of 1 mg/kg/day. The effect observed was maternal body-weight loss and decreased food consumption during dosing [gestation days 7-10] at the LOAEL of 3 mg/kg/day. The study selected was a developmental toxicity study on rabbits – MRID number 41198901. The toxicological endpoint selected for the inhalation route (any time period) is NOAEL of 0.1 µg/L based on increased lung weights and microscopic lesions in the lungs at the LOAEL of 0.49 µg/L. For both inhalation and dermal exposures, the uncertainty factor of 100 is the target MOE.

Diquat dibromide is not acutely toxic *via* the oral [Toxicity Category III] and inhalation [Toxicity Category III] routes of exposure but is moderately-to-severely toxic *via* the dermal [Toxicity Category II] route of exposure. Diquat dibromide is not a skin irritant [Toxicity Category IV] nor a dermal sensitizer, but it is considered a moderate-to-severe eye irritant [Toxicity Category II]. Acute toxicity data on diquat dibromide are summarized in Table 1.

Table 1: Acute Toxicity Data on Diquat Dibromide.

Guideline No.	Study Type	MRID #(S)	Results	Toxicity Category
870.1100	Acute Oral	00081506	*rat LD ₅₀ = 810 mg/kg ♂	III
		00092882	*rat LD ₅₀ = 600 mg/kg ♀	II
		00092882	rabbit LD ₅₀ = 190 mg/kg rat LD ₅₀ = 400-440 mg/kg	II
870.1200	Acute Dermal	00100614	*rabbits LD ₅₀ = 262 mg/kg ♂ *rabbits LD ₅₀ = 315 mg/kg ♀	II
		00061634	*rabbits LD ₅₀ = 288.5 mg/kg ♂+♀ rat LD ₅₀ = 50-100 mg/kg	I
870.1300	Acute Inhalation	26385 [†]	*rat LC ₅₀ = 0.80 mg/L ♂ *rat LC ₅₀ = 1.09 mg/L ♀ *rat LC ₅₀ = 0.97 mg/L ♂+♀	III
870.2400	Primary Eye Irritation	00081507	*rabbit slight to severe eye irritant	II
870.2500	Primary Skin Irritation	00107903	*slight irritation	IV
870.2600	Dermal Sensitization	00107903	not a dermal sensitizer	N/A
870.6200	Acute Neurotoxicity	42666801	NOAEL = 75 mg/kg/day	N/A

[†] Accession No.; *values are expressed in terms of the test material [Diquat Water Weed Killer] and not in terms of the Diquat ion.

3.3 Incident Report

Following incident report is included in the D281011 document:

There was an incident report for a worker using backpack sprayer to apply diquat to turf. Manoguerra (1990) reported on a 51-year-old Mexican male pesticide applicator who applied diquat to grasses using a hand pumped backpack sprayer. The only protective clothing worn by the patient was a pair of rubber boots. The sprayer leaked and "thoroughly saturated the patient's jacket, pants and allowed the herbicide to accumulate in the boots. The patient sprayed 30 to 33 tanks [each holding 20 liters] of herbicide [dilution not reported] following which he went home and bathed. During the night he awoke with a burning sensation on the bottom of his right foot. The next day, the patient used the same boots and noted that he had to dry them out with a cloth before putting them on." He continued working till noon when his feet became extremely painful and he washed his feet and performed other duties. The following day he was taken to the emergency department. The burns to his feet were determined to be full thickness and required intensive treatment including skin grafts. One week after the grafts were placed the patient was discharged from the hospital, though pain in the feet persisted for several months. The tenderness on his lower feet prevented him from standing for more than half an hour at a time and prevented him from returning to work. The author, director of the San Diego Regional Poison Center, complained in his discussion that the label implies that "the primary concern is absorption of the material through an abrasion, skin cut or area of irritation leading to system poisoning. The label states that the product 'causes skin irritation'." Dr. Manoguerra went on to recommend "it would seem prudent to include a statement on the product label to warn against improper clothing that allow seepage. The warnings should be strengthened to include the fact that prolonged contact of the product with the skin may produce burns." The Health Effects Division (HED) concurs with this recommendation. HED realizes that this incident represents a severe equipment failure resulting in what was likely a very large exposure to diquat.

4.0 Recommendations

As indicated in the D281011 document, HED does acknowledge that in all cases, the calculated MOEs showed no risk of concern for diquat dibromide. However, other factors such as acute toxicity and incident reports are also considered in the risk assessment.

Based on the acute toxicity (Category I & II for acute dermal toxicity), incident report (skin burns), and previous decision for the modification of PPE requirement (mixer/loaders must wear chemical resistant gloves & all workers must wear coverall over a single layer of clothes), HED would recommend NOT to change current PPE requirement on diquat dibromide.

CC: RAB2 RF, S. Wang



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 10, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-344884
EPA File Symbol or Registration Number: 524-535
Product Name: MON 78365 HERBICIDE
EPA Receipt Date: 08-Jun-2004
EPA Company Number: 524
Company Name: MONSANTO COMPANY

file copy

due 2/19/06

RUSSELL P. SCHNEIDER
MONSANTO CO
MONSANTO COMPANY
1300 I STREET, NW, SUITE 450 EAST
WASHINGTON, DC 20005

SUBJECT: Receipt of Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for Amendment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R35

NON-FAST TRACK (CHANGES TO REI;PPE;PHI;RATE AND NUMBER OF APPLICATIONS;ADD AERIAL APPLICATION;MODIFY GW/SW ADVISORY STATEMENT;

Please remit payment in the amount of: \$ 10,000 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

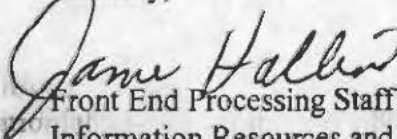
U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman, at (703) 305-6249.

Sincerely,



Front End Processing Staff

Information Resources and Services Division

● Fee for Service ●

This package includes the following

☐ New FFS Action

☒ Amendment

☐ Waiver Request

☐ Voluntary Payment Request

for Division

☒ RD

☐ AD

☐ BPPM

Receipt Nos. S- 761829

Product/Risk Manager: PM-25

EPA File Symbol/Reg. No. 524-535

Pin-Punch Date: 6-8-04

☐ This item is NOT subject to FFS action.

Action Code: R-35

Amount Due: \$ 10,000.00

Voluntary Payment Reduction Amount:

☐ 0%

☐ 10%

☐ 20%

☐ 25%

☐ 30%

☐ 40%

☐ 50%

☐ 60%

☐ 70%

☐ 75%

☐ 80%

☐ 90%

☐ 100%

☐ Other

____%

Original Decision #:

D- _____

Reviewer: J. Miller

Date: 6-10-04

Remarks:

Residential applicator exposure assessment
submitted to support reduction in PPE.



MONSANTO COMPANY
1300 I (EYE) STREET, NW
SUITE 450 EAST
WASHINGTON, D.C. 20005
PHONE (202) 383-2866
FAX (202) 789-1748
<http://www.monsanto.com>

June 2, 2004

Hand Delivered

Document Processing Center (REGFEE)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Attention: Mr. James A. Tompkins
Team Leader (25)

Subject: EPA Reg. No. 524-535
Submission of revised Master Label for Approval
Proposed change to required Personal Protective Equipment (PPE)
Data Submission: R.D. No. 1632

Dear Mr. Tompkins:

Monsanto herein submits for Agency review and approval an amended Master Label for EPA Reg. No. 524-535. This registration includes the brand names: MON 78365 Herbicide and QuikPRO Herbicide. The most recent version of the Master Label for this registration was approved by the Agency on May 12, 2003.

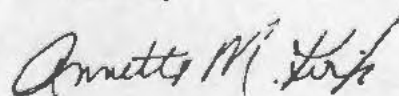
With this submission, Monsanto is requesting a reduction in the current PPE requirement for applicators and other handlers, removing both coveralls and chemical resistant gloves. Enclosed here is a one-volume data submission designated as R.D. No. 1632 that provides support for the requested PPE changes. The enclosed study is a residential applicator exposure assessment conducted by Monsanto for diquat dibromide as formulated in QuikPRO herbicide. This exposure assessment is based in part on information provided in publicly available EPA documents, including the Diquat Dibromide HED Risk Assessment for Tolerance Reassessment Eligibility Document (2002), and the Federal Register publication that outlines closure of the 1995 RED for Diquat Dibromide (67 FR 58797 September 18, 2002). The results of the submitted assessment indicate that even with very conservative assumptions applied to all application scenarios relevant to the use of QuikPRO the resulting margins-of-exposure are above the required safety factor, thus supporting the lack of need for coveralls and chemical resistant gloves as PPE. The revised PPE statement included in the proposed label is as follows: Long-sleeved shirt and long pants, protective footwear plus socks and protective eyewear.

The only other significant change to the submitted label is a slight modification of the rate description in the Annual Weeds and Perennial Weeds sections, to include a minimum recommended rate and provided clarification on what symptomology may be observed at lower use-rates in the range.

We believe that this amendment is subject to a Registration Service Fee under Action Code: R35; Non-fast track (changes to PPE). To inform Monsanto of the fee amount necessary to complete this action you may send an email message to: regulatory.affairs@monsanto.com

If you have any questions regarding this submission feel free to contact me through Russ Schneider at 202-383-2866 or directly at 314-694-8890.

Sincerely,

A handwritten signature in black ink, appearing to read "Annette M. Kirk".

Annette M. Kirk
Registration Manager

cc: J. Lambert

TRANSMITTAL DOCUMENT

SUBMITTED BY

Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, Missouri 63167

**REGULATORY ACTION IN SUPPORT OF WHICH THIS
PACKAGE IS SUBMITTED**

Additional Information to Support the Registration of QuikPRO™ Herbicide

TRANSMITTAL DATE

June 2, 2004

RD No. 1632 (1 Volume)

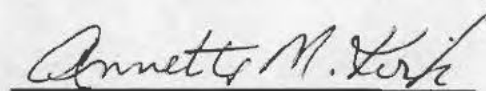
SUBMITTED STUDIES

Vol. Study Description

- 1 Gustin, C., "Residential Applicator Exposure Assessment for Diquat Dibromide as Formulated and Used in QuikPRO Herbicide" (2004), MSL-19290, an unpublished study conducted by Monsanto Company.

MRID **46291001** _____

COMPANY OFFICIAL:



Annette M. Kirk
Registration Manager

COMPANY NAME:

MONSANTO COMPANY
800 NORTH LINDBERGH BLVD.
ST. LOUIS, MO 63167

COMPANY CONTACT:

Russell P. Schneider
(202) 383-2866



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 10, 2004

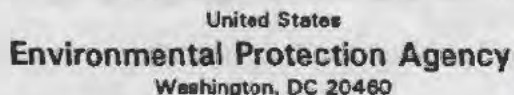
OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MONSANTO COMPANY
1300 I STREET, NW, SUITE 450 EAST
WASHINGTON, DC 20005

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 08-JUN-04. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



	Registration
X	Amendment
	Other

OPP Identifier Number

294188

Application for Pesticide - Section I

1. Company/Product Number Monsanto / 524-535	2. EPA Product Manager Mr. James Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) QuikPRO Herbicide	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I(Eye) Street, NW, Suite 450 East Washington, dC 20005 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="checked" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated "Me Too" Application.
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> Other - Explain below.
<input type="checkbox"/> Notification - Explain below.	

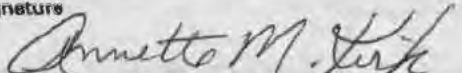
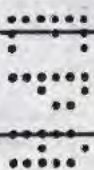
Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised master label
Proposed change to required Personal Protective Equipment
RD No. 1632

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No		Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt No. per container	
2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____					
3. Location of Net Contents Information		4. Size(s) Retail Container		5. Location of Label Directions	
<input type="checkbox"/> Label <input type="checkbox"/> Container				<input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point <i>(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</i>		
Name Dr. Russell P. Schneider	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (202) 383-2866
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name Annette M. Kirk	5. Date June 2, 2004	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Monsanto Company 1300 I (Eye) Street, NW, Suite 450 East, Washington, D.C., 20005, (202) 383-2866	EPA Registration Number/File Symbol 524-535
Active Ingredient(s) and/or representative test compound(s) glyphosate and diquat dibromide	Date Jun 2, 2004
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial, non-food, domestic outdoor	Product Name QuikPRO herbicide

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

☒ I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Annette M. Kirk</i>	Date 6/2/04	Typed or Printed Name and Title Annette M. Kirk, Registration Manager
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date Jun 2, 2004 EPA Reg No./File Symbol 524-535 Page 1 of 1

Applicant's/Registrant's Name & Address Monsanto Company
1300 I (Eye) Street, NW, Suite 450 East, Washington, D.C., 20005, (202) 383-2866
Product
QuikPRO Herbicide

Ingredient glyphosate and diquat dibromide

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Gustin, C., Residential Applicator Exposure Assessment for Diquat Dibromide as Formulated and Used in QuikPRO Herbicide. (2004), MSL-19290. An unpublished study conducted by Monsanto Company.	This submission	Monsanto	OWN	

Signature *Annette M. Kirk* Name and Title Annette M. Kirk, Registration Manager Date 6/2/04



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date Jun 2, 2004

EPA Reg No./File Symbol 524-535

Page 1 of 1

Applicant's/Registrant's Name & Address Monsanto Company

Product

1300 I (Eye) Street, NW, Suite 450 East, Washington, D.C., 20005, (202) 383-2866

QuikPRO Herbicide

Ingredient glyphosate and diquat dibromide

Guideline Reference Number

Guideline Study Name

MRID Number

Submitter

Status

Note

Monsanto

OWN

043

0.00.00

Signature

Annette M. Kirk

Name and Title

Annette M. Kirk, Registration Manager

Date

6/2/04

MONSANTO



July 25, 2006

Document Processing Desk
Registration Division - 7504P
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

MONSANTO COMPANY

800 NORTH LINDEBERG BLVD.
ST. LOUIS, MISSOURI 63107
<http://www.monsanto.com>

Attention: Mr. James A. Tompkins
Product Manager 25

Subject: **MON 78365 Herbicide; QuikPRO Herbicide**
EPA Reg. No. 524-535
Resubmission of Testing Report for Child Resistant Packaging

Dear Mr. Tompkins:

Pursuant to conversations with Ms. Rosalind Gross regarding our March 20, 2006 submission of Child Resistant Packaging certification, Monsanto is now submitting data from a second round of child testing performed by National Child Resistant Testing, Inc. (NCRT), both electronically and hard copy, consistent with PR 97-9.

Data on the Senior Adult Use Effectiveness Test was previously submitted as hard copy and is now being supplied electronically at Ms Gross request.

The Sequential Child Test previously submitted has been revised by the enclosed hard copy and electronic. Ms Gross requested the revised testing be done with 5 pouches of placebo (rice) consistent with the final unit packaging. Original testing was done with a single empty pouch.

Monsanto contracted with the National Child Resistant Testing Inc (NCRT) to perform the retesting of the Sequential Child Test to determine if the package if the package meets the requirements of 16 CFR 1700. The conclusion of the testing data indicates the package meets the standard for child-resistant packaging as it is defined in 16 CFR 1700.

Pursuant to the results of this testing, I certify that the packaging used for this product meets the standards of 40 CFR 157.32, including the revised standards 16 CFR 1700.15(b), when tested by the revised testing procedures in 16 CFR 1700.20, as published in 60 FR 37710 (July 21, 1995). The type of package is a sealed 4 3/16 x 5 3/4 inch foil pouch made of 3 mil valeron/7#LDPE/0.00035" foil/7# EMAA/ 1.25 mil Suryln Film manufactured by American Packaging.

This notification is outside the scope of PRIA and therefore no fee is due. The following documents are included with this notification:

Application for Pesticide (form 8570-1)
Final Report dated May 5, 2006 from NCRT
CD containing report and data

If you should have any questions regarding this submission, please call Dr. Russell P. Schneider at (202) 383-2866 or call me at (314) 694-6576.

Sincerely,

Dawn Fee-White
Registration Manager

Cc w/ attachments: Russ Schneider
Rosalind L. Gross, Technical Review Branch plus 3 cds
J. Winski

Attachment: Final Report by National Child Resistant Testing, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier
Number
303844

Application for Pesticide – Section I

1. Company/Product Number 524-535	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MON 78365; QUIKPRO Herbicide / Monsanto Company	PM # 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I Street, NW; Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section – II

- | | |
|--------------------------------------------------------------------------|--------------------------------------------------------------|
| <input type="checkbox"/> Amendment – Explain below. | <input type="checkbox"/> Final printed labels in response to |
| <input type="checkbox"/> Resubmission in response to Agency letter dated | <input type="checkbox"/> Agency letter dated |
| <input type="checkbox"/> Notification – Explain below. | <input type="checkbox"/> "Me Too" Application. |
| Other – Explain below. | |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Monsanto believes this is a fast-track notification with no associated PRIA fee. Please e-mail any fee requirement response to Regulatory.Affairs@Monsanto.com. Child Resistant Packaging Certification
I certify that the packaging that will be used for this product meets the standards of 40 CFR 157.32.

Section – III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) 3 mil Valeron/7#LDPE/0.00035" foil/7#EMAA/1.25 mil Surlyn film
	If "Yes" Unit Package 5-1.5 oz pouches at 7.5 ounces total weight No. per Container 5	If "Yes" Package wgt. No. per Container	

3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container	4. Size(s) Retail Container Box containing 5 1.5 oz pouches	5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product Included in retail sale box	<input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Russell P. Schneider Ph.D.	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (202) 383-2866
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name Dawn M. Fee-White	5. Date 26 July 2006	

National Child Resistant Testing, Inc.



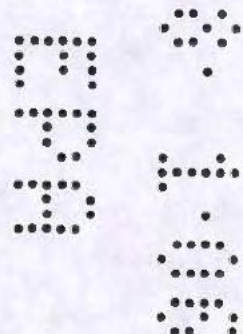
QuickPRO 1.5oz. Pouch

Final Report

Prepared For Monsanto Company

May 5, 2006

National Child Resistant Testing, Inc.
610 West Cuming Street, Lincoln, Nebraska 68521
(402)438-0216



2 TEST PROTOCOL

2.1 PACKAGE DESCRIPTION

2.1.1 Pouch:

- Material: 3 Mil Valeron/7# LDPE/ 0.00035" Foil/7# EMAA/1.25 Mil Surlyn Film
- Manufacturer: American Packaging
- Spec #: AP1088
- Finished Pouch Dimensions (approximate): $4 \frac{3}{16} \times 5 \frac{3}{4}$ inches
- Pouch tested with children was filled with a placebo (rice).
- Pouch tested with adults was empty

2.1.2 Opening Instructions: Scissors symbol at top of pouch with the following text: "TO OPEN, CUT HERE"

2.2 SAMPLE PREPARATION

- 2.2.1 The adult test samples were prepared in pairs and labeled with an identification number consisting of the NCRT job number (06-002) and a sequential sample number from 1 to 100. The pairs were differentiated with an "A" and "B" designation (e.g. 06-002-10A & 06-002-10B).
- 2.2.2 The child test samples were labeled with an identification number consisting of the NCRT job number (06-011), a sequential sample number from 1 to 50 and a "C" designation (e.g. 06-011-10C).
- 2.2.3 Twenty-five pouches were labeled with "Demo" to be used for demonstration during the child test.

2.3 PROCEDURES

- 2.3.1 The following procedures from the Code of Federal Regulations were used to conduct the test:
- Senior Adult Test - 16 CFR 1700.20 (a)(3)
 - Sequential Child Test- 16 CFR 1700.20 (a)(2)
- 2.3.2 All instructions given to the children and adult participants are detailed in the above regulatory citations.
- 2.3.3 At the beginning of the test, the adult participants were given a paper copy of the package artwork which included the opening instructions. The artwork was provided by Monsanto.
- 2.3.4 The children were given five pouches at the beginning of the test.

2.4 TEST PARTICIPANTS

- 2.4.1 100 adults (50-70 years), broken into three age groups (25%, 50-54 years; 25%, 55-59 years; 50%, 60-70 years). Gender breakdown of 70% female and 30% male in each age group.
- 2.4.2 50 children (42-51 months), broken into three age groups (30%, 42-44 months; 40%, 45-48 months; 30%, 49-51 months). Gender breakdown of 50% female and 50% male with 10% difference allowed in each age category.

National Child Resistant Testing, Inc.

2.5 FAILURE DEFINITIONS

- 2.5.1 Senior Adults: Any adult who was unable to open the package during the first five-minute test period, but was able to pass the screening test was counted as a failure. Or, any adult who was unable to open the package during the second one-minute test period was counted as a failure.
- 2.5.2 Children: Any child who was able to gain partial access to the inside of the pouch.

3 RESULTS

3.1 SENIOR ADULT TEST RESULTS

- 3.1.1 One hundred adults (100%) successfully opened the packages in both the 5-minute and the 1-minute test periods. The results are summarized in Table 1. The adult test sites are summarized in Table 2. The adult testers are summarized in Table 3.
- 3.1.2 Statistics
- Mean opening time of the 5-minute period was 15 seconds, Std. Dev. of 17
 - Mean opening time of the 1-minute period was 6 seconds, Std. Dev. of 7

Table 1
Adult panel, Total Packages Opened

Panelists				Successful Openings			
Age (Years)	Total	Males	Females	Opened in 5-minute Test Period		Opened in 1-minute Test Period	
				Male	Female	Male	Female
50-54	25	8	17	8	17	8	17
55-59	25	7	18	7	18	7	18
60-70	50	15	35	15	35	15	35
Totals	100	30	70	30	70	30	70

Table 2
Summary of Adult Test Sites

Test Site	Number of Adults Tested	% of Total Panel
2	24	24
3	1	1
4	11	11
5	2	2
9	24	24
10	1	1
13	24	24
16	13	13
Total	100 Adults	100%

National Child Resistant Testing, Inc.

Table 3
Summary of Adult Testers

Tester	Number of Adults Tested	% of Total Panel
CSN	12	12
MN	29	29
EE	35	35
PB	24	24
Total	100 Adults	100%

3.2 CHILD TEST RESULTS

- 3.2.1 Of the 50 children tested, two children successfully gained access to the inside of the pouch during the 10-minute test. One child opened the pouch in the first five-minute period (prior to demonstration), and one child opened the package in the second five-minute test period (after demonstration).
- 3.2.2 The results are summarized in Table 4. The individual failures are described in Table 5. The child test sites are summarized in Table 6. The child testers are summarized in Table 7.
- 3.2.3 Statistics: The mean opening time and standard deviation do not apply because only one child opened the package in each test period.

Table 4
Child Panel, Results

Panelists				Successful Entries				
Age (Months)	Total	Males	Females	Before Demonstration		After Demonstration		Total Entries
				Males	Female	Males	Female	
42 - 44	15	8	7	1	0	0	0	1
45 - 48	20	10	10	0	0	0	0	0
49 - 51	15	7	8	0	0	0	1	1
Totals	50	25	25	1	0	0	1	2

Table 5
Child Panel, Detail of Individual Failures

Sample #	Gender	Age (mo)	Time of Entry (total elapsed seconds)	Entry Description
12	F	51	570	Used teeth to tear open
50	M	42	35	Tore the package with teeth and proceeded to tear open with fingers

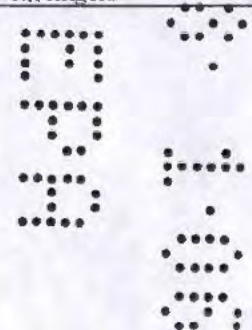


Table 6
Child Panel, Test Site Summary

Test Site	Number of Children Tested	% of Total Panel
5	5	10
19	6	12
20	2	4
22	10	20
25	8	16
27	5	10
33	6	12
60	8	16
Total	50 Children	100%

Table 7
Child Panel, Tester Summary

Tester (Tester No.)	Number of Children Tested	% of Total Panel
CSN (1)	13	26
MN (2)	14	28
BN (10)	14	28
CS (11)	9	18
Total	50 Children	100%

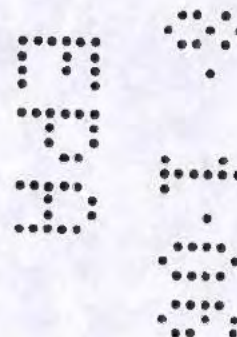
4 CONCLUSION

The testing data indicate the package meets the standard for child-resistant packaging as it is defined in the Code of Federal Regulations 16 CFR 1700. The adult use effectiveness was found to be 100%.

Submitted By: Chris Novosad
Chris Novosad

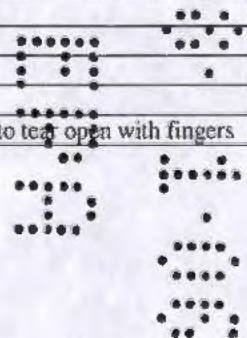
Date: 5-5-06

National Child Resistant Testing, Inc.



Child Test Data

Sample #	Gender	Age (mo)	Time of Entry (elapsed seconds)	Method of Entry
1	F	46		
2	M	47		
3	F	42		
4	F	47		
5	M	42		
6	M	46		
7	F	47		
8	M	47		
9	F	49		
10	F	47		
11	F	46		
12	F	51	570	Used teeth to tear open
13	M	51		
14	F	51		
15	M	51		
16	M	42		
17	F	48		
18	F	44		
19	M	44		
20	F	49		
21	F	43		
22	M	42		
23	M	46		
24	F	44		
25	M	50		
26	M	48		
27	M	44		
28	M	45		
29	M	51		
30	M	49		
31	M	48		
32	F	51		
33	M	44		
34	M	49		
35	F	42		
36	F	46		
37	M	44		
38	F	48		
39	F	42		
40	F	47		
41	F	43		
42	M	48		
43	F	45		
44	M	45		
45	M	45		
46	F	50		
47	F	51		
48	M	50		
49	F	49		
50	M	42	35	Tore the package with teeth and proceeded to tear open with fingers



5 DATA TABLES

Senior Adult Test Data

Sample #	Gender	Age	5-min Open Time (sec)	1-min Open Time (sec)	Result Pass/Fail	Comments
1	M	55	3	2	P	N/A
2	F	58	3	2	P	N/A
3	F	51	1	1	P	N/A
4	F	59	6	1	P	N/A
5	F	60	2	2	P	N/A
6	M	69	6	2	P	N/A
7	F	56	3	3	P	N/A
8	M	54	1	1	P	N/A
9	F	57	2	1	P	N/A
10	F	58	2	2	P	N/A
11	F	50	3	1	P	N/A
12	F	65	1	2	P	N/A
13	F	51	2	1	P	N/A
14	M	54	2	2	P	N/A
15	M	63	2	2	P	N/A
16	F	52	1	2	P	N/A
17	F	59	4	1	P	N/A
18	M	58	3	3	P	N/A
19	F	57	2	3	P	N/A
20	M	63	2	2	P	N/A
21	F	62	1	2	P	N/A
22	F	54	13	1	P	N/A
23	F	68	8	3	P	N/A
24	F	54	1	1	P	N/A
25	F	60	22	2	P	N/A
26	M	51	23	9	P	N/A
27	F	59	17	3	P	N/A
28	F	64	16	4	P	N/A
29	F	63	10	4	P	N/A
30	F	68	6	13	P	N/A
31	F	61	15	6	P	N/A
32	F	54	7	5	P	N/A
33	F	60	18	4	P	N/A
34	F	60	10	4	P	N/A
35	M	53	6	13	P	N/A
36	F	52	5	4	P	N/A
37	F	69	9	7	P	N/A
38	M	66	25	3	P	N/A
39	F	54	26	3	P	N/A
40	M	57	31	9	P	N/A
41	M	58	3	3	P	N/A
42	F	50	8	2	P	N/A
43	M	62	22	2	P	N/A
44	F	66	10	32	P	N/A
45	M	59	5	5	P	N/A
46	F	50	8	2	P	N/A
47	F	56	8	6	P	N/A
48	M	62	11	5	P	N/A
49	F	56	15	3	P	N/A

National Child Resistant Testing, Inc.

QuickPRO 1.5oz. Pouch
Final Report for Monsanto Company

Sample #	Gender	Age	5-min Open Time (sec)	1-min Open Time (sec)	Result Pass/Fail	Comments
50	M	58	10	3	P	N/A
51	M	60	17	5	P	N/A
52	M	61	3	2	P	N/A
53	F	57	35	11	P	N/A
54	F	60	5	9	P	N/A
55	M	51	6	2	P	N/A
56	F	66	26	4	P	N/A
57	F	54	5	6	P	N/A
58	F	69	25	6	P	N/A
59	F	66	13	3	P	N/A
60	F	58	13	4	P	N/A
61	F	69	17	6	P	N/A
62	M	53	8	2	P	N/A
63	F	57	3	3	P	N/A
64	F	59	21	9	P	N/A
65	F	54	6	4	P	N/A
66	F	60	17	4	P	N/A
67	F	66	9	4	P	N/A
68	M	54	6	4	P	N/A
69	M	60	35	12	P	N/A
70	F	57	6	4	P	N/A
71	F	58	3	3	P	N/A
72	M	68	28	8	P	N/A
73	F	60	3	6	P	N/A
74	F	57	46	6	P	N/A
75	F	64	21	44	P	N/A
76	M	57	6	3	P	N/A
77	F	61	109	9	P	N/A
78	F	61	7	2	P	N/A
79	F	68	10	10	P	N/A
80	F	69	15	4	P	N/A
81	M	70	38	13	P	N/A
82	F	61	9	4	P	N/A
83	F	61	35	13	P	N/A
84	F	51	6	6	P	N/A
85	F	52	9	3	P	N/A
86	F	60	5	5	P	N/A
87	M	60	5	1	P	N/A
88	F	51	10	5	P	N/A
89	F	51	13	10	P	N/A
90	F	69	24	3	P	N/A
91	M	50	81	5	P	N/A
92	F	59	7	3	P	N/A
93	M	67	12	23	P	N/A
94	F	66	50	38	P	N/A
95	M	68	13	12	P	N/A
96	F	64	57	10	P	N/A
97	F	63	19	4	P	N/A
98	M	64	17	3	P	N/A
99	F	66	51	21	P	N/A
100	F	67	49	7	P	N/A

National Child Resistant Testing, Inc.

Rosalind
Gross/DC/USEPA/US
04/19/2006 05:02 PM

To "FEE-WHITE, DAWN M [AG/1000]"
<dawn.m.fee-white@monsanto.com>
cc Vickie Walters/DC/USEPA/US@EPA
bcc
Subject Re: Monsanto QuikPRO CRP

Dawn

It was good to talk with you this morning. As noted here are my comments regarding the child test. Please note there is one comment to the customer test agreement. It is The 50% male 50% female distribution of the child panel is for each age group. If you have any questions please feel free to call me. I will be in the office tomorrow.

Notes on EPA Reg. No. 524-535 CRP Testing

The children should be given 5 pouches at the beginning of the test. A placebo of rice is acceptable.

The definition of a child failure should be access to any amount of one pouch
The definition of a pouch failure should be access to any amount of one pouch by any means such as puncture (even by one tooth), tear, open, etc. Note the placebo does not have to come out of the pouch the potential for placebo access such as through a tooth puncture is sufficient for a pouch failure. This approach is being adopted based on a worst case scenario calculation of a toxic or harmful amount of the product to an 11.4kg child, which is 118.2mg and a pouch contains 42,500mg of the product.

The 50% male 50% female distribution of the child panel is for each age group. Please note this in the customer test agreement, which you sent me 4/18/06.

The final child report should include: a statement that the pouch was tested with placebo resembling the product; a statement that the number of pouches each child received at the beginning of the test was 5; a photograph of the pouch tested; a description of the material composition of the pouch.

The child study should be submitted in hard copy as well as electronic copy per PR 97-9. The test date and birth date fields should be numeric. The senior adult study should be resubmitted in hard copy with the electronic copy per PR 97-9. The test date and birth date fields should be numeric. The CD should be closed so that nothing else can be written to it. Copies of the CD should be retained in case something happens to the Agency copy and it needs to be resubmitted or certain fields need to be corrected.

Save all child test samples until the Agency accepts the data.

Rosalind Gross
Registration Division
CM-2, Room 262
1801 South Bell St.
Arlington, VA 22202
telephone 703-308-7368
fax 703-308-9382
email gross.rosalind@epa.gov

"FEE-WHITE, DAWN M [AG/1000]" <dawn.m.fee-white@monsanto.com>



"FEE-WHITE, DAWN M
[AG/1000]"
<dawn.m.fee-white@monsanto.com>

04/18/2006 04:02 PM

To Rosalind Gross/DC/USEPA/US@EPA
cc
Subject Monsanto QuikPRO CRP

Rosalind, thank you for the time last week on the phone. We had discussed possible review of the protocol and the number of pouches that may be necessary to fulfill the testing requirements. The National Child Resistant Testing that will performing our Child Resistant Test, has provided the attached outline of the re-test plan. Will this be sufficient? I've asked that they specify uncooked rice (rather than just rice) as the placebo. According to my manufacturing contact, this substance most closely resembles the QuikPRO product. As for the specific details of the testing protocol, they would follow the requirements of 1700.20. Please advise if the attached will fulfill our re-testing requirement or if we need to provide more than 5 pouches per child. Remember this is only sold in a box of five (5) 1.5 oz pouches. I seriously don't expect marketing to ever want to sell in higher units. Thanks for your direction.

Dawn Fee-White
Monsanto
314-694-6576

<<Customer Test Agreement - Monsanto 06-011.doc>>

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Fee for Service



This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr.

25

Receipt No.

S-

792230

EPA File Symbol/Reg. No.

524-535

Pin-Punch Date:

3/23/06

☒ This item is NOT subject to FFS action.

6/15/06

Action Code:

Requested:

—

Granted:

R-34

Amount Due: \$ 3,150⁰⁰

Parent/Child Decisions:

Human Studies:

Cite-All

Selective Support

Tox (excluding Six-Pack)

Other Human Research (efficacy, exposure, etc.)

Reviewer: J. Miller

Date: 3-29-06

Remarks:

CRA Certification and data results presented.

Resubmission from previous PRTA action — no Fee
6/17/06



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 29, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-366232
EPA File Symbol or Registration Number: 524-535
Product Name: MON 78365 HERBICIDE
EPA Receipt Date: 23-Mar-2006
EPA Company Number: 524
Company Name: MONSANTO COMPANY

RUSSELL P. SCHNEIDER
MONSANTO CO
MONSANTO COMPANY
1300 I STREET, NW, SUITE 450 EAST
WASHINGTON, DC 20005

SUBJECT: Receipt of Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for Amendment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R34

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL
STATEMENTS;SOURCE CHANGES TO AN UNREGISTERED SOURCE);

Please remit payment in the amount of: \$ 3,150 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

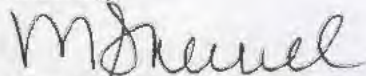
By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 S. Bell St.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman, at (703) 305-6249.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

303848

Application for Pesticide - Section I

1. Company/Product Number Monsanto Company / 524-535	2. EPA Product Manager Mr. James Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MON 78365; QuikPro Herbicide	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I (Eye) Street, N.W., Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Certification of CRP.

Monsanto believes this is a fast-track notification with no associated PRIA fee. Please email any fee requirement response to Regulatory.Affairs@Monsanto.com.

I certify that the packaging that will be used for this product meets the standard 40 CFR 157.32

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt. 1.5 oz.	No. per container 5	If "Yes" Package wgt.	No. per container
				<input checked="" type="checkbox"/> Other (Specify) foil pouch	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1.5 oz.		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other printed on foil			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dr. Russell P. Schneider	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (202) 383-2866
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Dawn Fee-White</i>	3. Title Registration Manager	
4. Typed Name Dawn Fee-White	5. Date March 20, 2006	

Rosalind
Gross/DC/USEPA/US
03/27/2006 03:12 PM

To: Vickie Walters/DC/USEPA/US@EPA
cc: kate.walker@monsanto.com
bcc:
Subject: EPA Reg No. 524-535

Vickie

I got the crp data and certification for EPA Reg. No. 524-535 on thursday from Jim Tompkins. He is supposed to be getting MRID and DP # is 327949. I called Russ about getting the crp data electronically per PR97-9. This morning when I reviewed it a number of questions cropped up. Called Kate Walker about questions as Russ was out sick. The questions are:

Which is the new label? Is the new label the one with the picture of the scissors? The label tested should be the one used?

Was the packet tested with placebo? Did the placebo resemble the actual product form?

A child failure was defined as access to one packet, which should be spelled out clearly in the report?

Are the scissors being sold or given away with the packets? If so, then the children need to be given scissors for testing?

From the submission it appears the product is being sold as 5 pack of 1.5oz. packets. If this is correct then children need to be given amount in retail pack at beginning of test and not just one 1.5oz. packet as was done. This may necessitate redoing the child test. Actual number of 1.5oz. packets to a child at beginning of test may be 9 not 5 depending on toxic or harmful amount of product. Vickie need to know the acute toxicity and inhalation toxicity values for product. Can you get information for me? Also when do we think HED will resolve inhalation toxicity issue for product as it may eliminate need for CRP based on comments by Kate Walker to me regarding EPA Reg No. 524-535. Thanks.

Rosalind Gross
Registration Division
CM-2, Room 262
1801 South Bell St.
Arlington, VA 22202
telephone 703-308-7368
fax 703-308-9382
email gross.rosalind@epa.gov

Rosalind
Gross/DC/USEPA/US
03/28/2006 02:31 PM

To Vickie Walters/DC/USEPA/US@EPA
cc
bcc
Subject Monsanto

Vickie

In addition to the stuff I told you I needed yesterday, I need the tox data that you are giving to Rick Loranger for their exemption too. The reason is that I need to convert the current and new LC50 numbers to a toxic or harmful amount for CRP. To do this I talked with John Redden and he says he needs to see acute tox and LC50 data (at least that is what I am understanding). Sorry to bug you. Monsanto's attorney Winski is bugging me. Ah for Russ to be healthy again.

Rosalind Gross
Registration Division
CM-2, Room 262
1801 South Bell St.
Arlington, VA 22202
telephone 703-308-7368
fax 703-308-9382
email gross.rosalind@epa.gov

MONSANTO



MONSANTO COMPANY

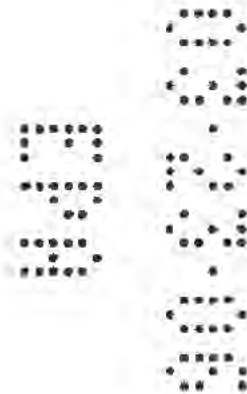
1500 I STREET, NW
SUITE 450 EAST
WASHINGTON, D.C. 20004
PHONE (202) 383-2866
FAX (202) 280-1748
HTTP://WWW.MONSANTO.COM

March 20, 2006

Document Processing Desk
Registration Division – H7505C
U.S. Environmental Protection Agency
1801 South Bell Street
Crystal Mall #2, Room 266A
Arlington, Virginia 22202-4501

Attention: Mr. James A. Tompkins
Product Manager 25

Subject: **MON 78365 Herbicide**
QuikPRO Herbicide
EPA Reg. No. 524-535
Certification of Child Resistant Packaging



Dear Mr. Tompkins:

Monsanto herein requests the Agency approval of child resistant packaging for the 1.5 oz foil pouch for QuikPRO Herbicide. This label is based on the EPA Stamped label dated May 12, 2003.

After a meeting between Monsanto and the Agency January 13, 2005, in a letter dated February 8, 2005, Monsanto agreed to research child resistant packaging options for package skus of QuikPRO herbicide. Pursuant to requirements in 40 CFR Part 157.22, and 157.34, Monsanto submitted certification to child-resistant packaging for the 6.8 lb package of QuikPRO herbicide, MON 78365 and distributor supplemental product, Lesco Prosecutor Swift Acting, 524-535-10404 in a letter dated January 24, 2006. Monsanto selected a Van Blarcom Closure, Saf Cap III-A, ASTM certified type I closure compliant with CFR Title 16, Part 1700 and on the EPA list of approved CRP vendors.

Monsanto contracted with National Child Resistant Testing Inc (NCRT) to perform a Sequential Child Test and a Senior Adult Use Effectiveness Test on a new pouch and material to determine if the package meets the requirements of 16 CFR 1700. The results of this testing are attached.

Pursuant to the results of this testing, I certify that the packaging used for this product meets the standards of 40 CFR 157.32, including the revised standards in 16 CFR 1700.15(b), when tested by the revised testing procedures in 16 CFR 1700.20, as published in 60 FR 37710 (July 21, 1995). The type of package is a sealed 4 3/16 x 5 3/4 inch foil pouch made of 3 mil valeron/7#LDPE/ 0.00035" foil/7# EMAA/1.25 Mil Surlyn Film manufactured by American Packaging.

This amendment is classified as part of the Agency's Fast-Track Program and therefore no fee is due. The following documents are included with this notification:

Application for Pesticide (form 8570-1)
Final Report dated February 23, 2006 from NCRT
Existing pouch artwork and revised pouch artwork

If you should have any questions regarding this submission, please call Dr. Russell P. Schneider at (202) 383-2866 or call me at (314) 694-6576.

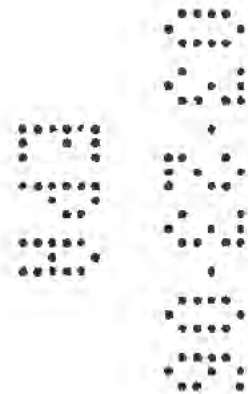
Sincerely,



Dawn Fee-White
Registration Manager

Cc w/ attachments: Russ Schneider
Rosalind L. Gross, Technical Review Branch
J. Winski
File

Attachment: Final Report by National Child Resistant Testing, Inc.





Read the enclosed label booklet before using this product. Lea todo el folleto adjunto antes de usar este producto. Use only according to label instructions. Read the "LIMIT OF WARRANTY AND LIABILITY", which appears in the label booklet, before buying or using. If terms are not acceptable, return at once unopened. THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION OR REPACKAGING.

Keep out of reach of children.

CAUTION! Read precautions in enclosed booklet.

ACTIVE INGREDIENTS:

*Glyphosate, N-(phosphonomethyl) glycine, in the form of its ammonium salt	73.3%
Diquat dibromide [6,7-dihydrodipyrido (1,2-a:2',1'-c) pyrazinediium dibromide]	2.9%
OTHER INGREDIENTS:	23.8%
	100.0%

*Equivalent to 66.6% of the acid, glyphosate

1.0 pound of QuikPRO® herbicide contains 0.73 pound of the ammonium salt of glyphosate and 0.03 pound of the dibromide salt of diquat.

NET 1.5 OZ

THIS MULTIPACK UNIT NOT LABELED FOR INDIVIDUAL SALE

See label booklet for Complete Directions for Use

In case of an emergency involving this product, Call Collect, day or night, (314) 694-4000.

QuikPRO and Powered by Roundup Technology are trademarks of Monsanto Technology LLC.

Product of Brazil; Formulated in the U.S. with U.S. Ingredients

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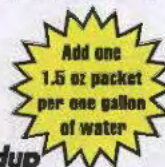
EPA Est. 065387-AR-001

EPA Reg. No. 524-535

98005B1-15B PW

FPO

TO OPEN
CUT HERE



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QuikPRO and Powered by Roundup Technology are trademarks of Monsanto Technology LLC. Product of Brazil; Formulated in the U.S. with U.S. Ingredients.

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EPA Est. 065387-AR-001

EPA Reg. No. 524-535

98005D2-15BPW

National Child Resistant Testing, Inc.



QuickPRO 1.5oz. Pouch

Final Report

Prepared For Monsanto Company

February 23, 2006

*National Child Resistant Testing, Inc.
610 West Cuming Street, Lincoln, Nebraska 68521
(402)438-0216*

QuickPRO 1.5oz. Pouch
Final Report for Monsanto Company

1 GENERAL INFORMATION

Client: Monsanto Company
800 North Lindbergh Blvd.
St. Louis, MO 63167

Purchase Order: 4508903354

Service Requested: The client has requested a Sequential Child Test and a Senior Adult Use Effectiveness Test be conducted on a pouch to determine if the package meets the requirements of 16 CFR 1700 (Revised July 21, 1995).

Test Performed: Senior Adult Use Effectiveness Test and Sequential Child Test per 16 CFR 1700

Test Start Date: 2/07/2006

Test End Date: 2/22/2006

NCRT Job #: 06-002

Summary of Results: The testing data indicate the package meets the standard for child-resistant packaging as it is defined in the Code of Federal Regulations 16 CFR 1700.



Package with job number



Print with opening instructions

National Child Resistant Testing, Inc.

2 TEST PROTOCOL

2.1 PACKAGE DESCRIPTION

2.1.1 Pouch:

- Material: 3 Mil Valeron/7# LDPE/ 0.00035" Foil/7# EMAA/1.25 Mil Sarlyn Film
- Manufacturer: American Packaging
- Spec #: AP1088
- Finished Pouch Dimensions (approximate): $4 \frac{3}{16} \times 5 \frac{3}{4}$ inches

2.1.2 Opening Instructions: Scissors symbol at top of pouch with the following text: "TO OPEN, CUT HERE"

2.2 SAMPLE PREPARATION

2.2.1 The adult test samples were prepared in pairs and labeled with an identification number consisting of the NCRT job number (06-002) and a sequential sample number from 1 to 100. The pairs were differentiated with an "A" and "B" designation (e.g. 06-002-10A & 06-002-10B).

2.2.2 The child test samples were labeled with an identification number consisting of the NCRT job number (06-002), a sequential sample number from 1 to 50 and a "C" designation (e.g. 06-002-10C).

2.2.3 Twenty-five pouches were labeled with "Demo" to be used for demonstration during the child test.

2.3 PROCEDURES

2.3.1 The following procedures from the Code of Federal Regulations were used to conduct the test:

- Senior Adult Test - 16 CFR 1700.20 (a)(3)
- Sequential Child Test- 16 CFR 1700.20 (a)(2)

2.3.2 All instructions given to the children and adult participants are detailed in the above regulatory citations.

2.3.3 At the beginning of the test, the adult participants were given a paper copy of the package artwork which included the opening instructions. The artwork was provided by Monsanto.

2.3.4 The children were given one pouch at the beginning of the test.

2.4 TEST PARTICIPANTS

2.4.1 100 adults (50-70 years), broken into three age groups (25%, 50-54 years; 25%, 55-59 years; 50%, 60-70 years). Gender breakdown of 70% female and 30% male in each age group.

2.4.2 50 children (42-51 months), broken into three age groups (30%, 42-44 months; 40%, 45-48 months; 30%, 49-51 months). Gender breakdown of 50% female and 50% male with a 10% difference allowed in each age category.

2.5 FAILURE DEFINITIONS

- 2.5.1 Senior Adults: Any adult who was unable to open the package during the first five-minute test period, but was able to pass the screening test was counted as a failure. Or, any adult who was unable to open the package during the second one-minute test period was counted as a failure.
- 2.5.2 Children: Any child who was able to gain partial access to the inside of the pouch.

3 RESULTS

3.1 SENIOR ADULT TEST RESULTS

- 3.1.1 One hundred adults (100%) successfully opened the packages in both the 5-minute and the 1-minute test periods. The results are summarized in Table 1. The adult test sites are summarized in Table 2. The adult testers are summarized in Table 3.
- 3.1.2 Statistics
- Mean opening time of the 5-minute period was 15 seconds, Std. Dev. of 17
 - Mean opening time of the 1-minute period was 6 seconds, Std. Dev. of 7

Table 1
Adult panel, Total Packages Opened

Panelists				Successful Openings			
Age (Years)	Total	Males	Females	Opened in 5-minute Test Period		Opened in 1-minute Test Period	
				Male	Female	Male	Female
50-54	25	8	17	8	17	8	17
55-59	25	7	18	7	18	7	18
60-70	50	15	35	15	35	15	35
Totals	100	30	70	30	70	30	70

Table 2
Summary of Adult Test Sites

Test Site	Number of Adults Tested	% of Total Panel
2	24	24
3	1	1
4	11	11
5	2	2
9	24	24
10	1	1
13	24	24
16	13	13
Total	100 Adults	100%

QuickPRO 1.5oz. Pouch
Final Report for Monsanto Company

Table 3
Summary of Adult Testers

Tester	Number of Adults Tested	% of Total Panel
CSN	12	12
MN	29	29
EE	35	35
PB	24	24
Total	100 Adults	100%

1

3.2 CHILD TEST RESULTS

- 3.2.1 Of the 50 children tested, one child successfully gained access to the inside of the pouch during the 10-minute test. The one opening occurred in the first five-minute period prior to the demonstration.
- 3.2.2 The results are summarized in Table 4. The individual failures are described in Table 5. The child test sites are summarized in Table 6. The child testers are summarized in Table 7.
- 3.2.3 Statistics: The mean opening time and standard deviation do not apply because only one of the children opened the package (opened in first 5-minute period).

Table 4
Child Panel, Results

Panelists				Successful Entries				
Age (Months)	Total	Males	Females	Before Demonstration		After Demonstration		Total Entries
				Males	Female	Males	Female	
42 - 44	15	8	7	0	0	0	0	0
45 - 48	20	10	10	0	0	0	0	0
49 - 51	15	8	7	1	0	0	0	1
Totals	50	25	25	1	0	0	0	1

Table 5
Child Panel, Detail of Individual Failures

Sample #	Gender	Age (mo)	Time of Entry (total elapsed seconds)	Entry Description
44	M	50	181	Peeled at corner and tore open

National Child Resistant Testing, Inc.

QuickPRO 1.5oz. Pouch
Final Report for Monsanto Company

Table 6
Child Panel, Test Site Summary

Test Site	Number of Children Tested	% of Total Panel
2	10	20
17	10	20
13	10	20
58	3	6
40	3	6
72	3	6
73	2	4
21	1	2
27	4	8
29	4	8
Total	50 Children	100%

Table 7
Child Panel, Tester Summary

Tester	Number of Children Tested	% of Total Panel
CSN	15	30
EE	15	30
MN	5	10
CM	10	20
SS	5	10
Total	50 Children	100%

4 CONCLUSION

The testing data indicate the package meets the standard for child-resistant packaging as it is defined in the Code of Federal Regulations 16 CFR 1700. The adult use effectiveness was found to be 100%.

Submitted By: Chris Novosad
Chris Novosad

Date: 2-23-06

National Child Resistant Testing, Inc.

5 DATA TABLES

Senior Adult Test Data

Sample #	Gender	Age	5-min Open Time (sec)	1-min Open Time (sec)	Result Pass/Fail	Comments
1	M	55	3	2	P	
2	F	58	3	2	P	
3	F	51	1	1	P	
4	F	59	6	1	P	
5	F	60	2	2	P	
6	M	69	6	2	P	
7	F	56	3	3	P	
8	M	54	1	1	P	
9	F	57	2	1	P	
10	F	58	2	2	P	
11	F	50	3	1	P	
12	F	65	1	2	P	
13	F	51	2	1	P	
14	M	54	2	2	P	
15	M	63	2	2	P	
16	F	52	1	2	P	
17	F	59	4	1	P	
18	M	58	3	3	P	
19	F	57	2	3	P	
20	M	63	2	2	P	
21	F	62	1	2	P	
22	F	54	13	1	P	
23	F	68	8	3	P	
24	F	54	1	1	P	
25	F	60	22	2	P	
26	M	51	23	9	P	
27	F	59	17	3	P	
28	F	64	16	4	P	
29	F	63	10	4	P	
30	F	68	6	13	P	
31	F	61	15	6	P	
32	F	54	7	5	P	
33	F	60	18	4	P	
34	F	60	10	4	P	
35	M	53	6	13	P	
36	M	61	3	2	P	
37	F	52	5	4	P	
38	F	69	9	7	P	
39	M	66	25	3	P	
40	F	54	26	3	P	
41	M	57	31	9	P	
42	M	58	3	3	P	
43	F	50	8	2	P	
44	M	62	22	2	P	
45	F	66	10	32	P	
46	M	59	5	5	P	
47	F	50	8	2	P	
48	F	56	8	6	P	
49	M	62	11	5	P	

National Child Resistant Testing, Inc.

QuickPRO 1.5oz. Pouch
Final Report for Monsanto Company

Sample #	Gender	Age	5-min Open Time (sec)	1-min Open Time (sec)	Result Pass/Fail	Comments
50	F	56	15	3	P	
51	M	58	10	3	P	
52	M	60	17	5	P	
53	F	57	35	11	P	
54	F	60	5	9	P	
55	M	51	6	2	P	
56	F	66	26	4	P	
57	F	54	5	6	P	
58	F	69	25	6	P	
59	F	66	13	3	P	
60	F	58	13	4	P	
61	F	69	17	6	P	
62	M	53	8	2	P	
63	F	57	3	3	P	
64	F	59	21	9	P	
65	F	54	6	4	P	
66	F	60	17	4	P	
67	F	66	9	4	P	
68	M	54	6	4	P	
69	M	60	35	12	P	
70	F	57	6	4	P	
71	F	58	3	6	P	
72	M	68	28	8	P	
73	F	60	3	6	P	
74	F	57	46	6	P	
75	F	64	21	44	P	
76	M	57	6	3	P	
77	F	61	109	9	P	
78	F	61	7	2	P	
79	F	68	10	10	P	
80	F	69	15	4	P	
81	M	70	38	13	P	
82	F	61	9	4	P	
83	F	61	35	13	P	
84	F	51	6	6	P	
85	F	52	9	3	P	
86	F	60	5	5	P	
87	M	60	5	1	P	
88	F	51	10	5	P	
89	F	51	13	10	P	
90	F	69	24	3	P	
91	M	50	81	5	P	
92	F	59	7	3	P	
93	M	67	12	23	P	
94	F	66	50	38	P	
95	M	68	13	12	P	
96	F	64	57	10	P	
97	F	63	19	4	P	
98	M	64	17	3	P	
99	F	66	51	21	P	
100	F	67	49	7	P	

QuickPRO 1.5oz. Pouch
Final Report for Monsanto Company

Child Test Data

Sample #	Gender	Age (mo)	Time of Entry (elapsed seconds)	Method of Entry
1	M	49		
2	M	51		
3	F	47		
4	F	48		
5	M	48		
6	M	47		
7	M	48		
8	M	47		
9	F	45		
10	M	46		
11	M	47		
12	F	51		
13	F	45		
14	M	46		
15	F	43		
16	F	44		
17	M	43		
18	F	44		
19	F	44		
20	M	44		
21	F	44		
22	M	49		
23	M	43		
24	M	42		
25	M	47		
26	F	46		
27	F	47		
28	F	44		
29	M	43		
30	F	43		
31	M	45		
32	F	50		
33	F	47		
34	F	48		
35	M	50		
36	M	50		
37	F	46		
38	M	42		
39	M	51		
40	M	48		
41	F	49		
42	M	44		
43	M	42		
44	M	50	181	Peeled at corner and tore open
45	F	48		
46	F	49		
47	F	51		
48	F	51		
49	M	50		
50	F	50		

National Child Resistant Testing, Inc.



March 6, 2006

MONSANTO COMPANY
 1100 JEFFERSON STREET, NW
 SUITE 450 EAST
 ARLINGTON, D.C. 20005
 PHONE (703) 383-2800
 FAX (703) 789-1748
<http://www.monsanto.com>

Document Processing Center (NOTIF)
 Office of Pesticide Programs (7504C)
 U.S. Environmental Protection Agency
 Room 266A, Crystal Mall #2
 1921 Jefferson Davis Highway
 Arlington, VA 22202-4501

Attention: Mr. James A. Tompkins
 Team Leader (25)

Subject: **QuikPro Herbicide (EPA Reg. No. 524-535)/**
Submission of Final Printed Label Booklet

Dear Mr. Tompkins:

Monsanto is submitting for your files three (3) copies of the final printed label booklet for QuikPro Herbicide (EPA Reg. No. 524-535, Print Plate No. 98005E4-12/53). This label is based on the EPA stamped Master Label dated May 12, 2003. Monsanto notified the EPA on January 24, 2006 of this updated label specifying resize of this booklet to fit the new child resistant packaging. Enclosed is additional information of the most recent revisions. Monsanto certifies that the Spanish is an accurate translation of the English.

- Removed "It is a violation of Federal law to use....." Deleted Container label statements.
- In INGREDIENTS, added circle R after QuikPRO.
- Capitalized FIRST AID headers ("IF SWALLOWED", etc.).
- Deleted "See container label from STORAGE AND DISPOSAL instructions."
- Deleted several items from the Storage and Disposal section - "Container label Statements", "(ALL CONTAINERS)", "cleaned, reconditioned, or", "FOR REFILLABLE PORTABLE CONTAINERS" paragraph, "FOR BULK CONTAINERS" paragraph, "(FOR PLASTIC 1-WAY CONTAINERS AND BOTTLES" heading. Added "DISPOSAL" before Wastes resulting from the use etc."
- Section 7.1 - added hyphen to "flat-fan".
- Replaced "See table in hand held mixing section for larger mixing volumes." with "See table in "Mixing for Hand-Held Sprayers", Section 6.2 for larger mixing volumes." in 3 places

March 6, 2006

QuikPro Herbicide (EPA Reg. No. 524-535)

Submission of Final Printed Label Booklet

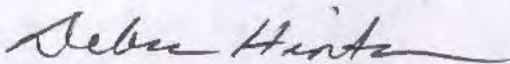
Page 2

- Section 8.0, 2nd paragraph, "woody brush tables" replaced with "brush weed and tree seedling tables."
- Deleted "This product may be tank mixed with the following products." etc. and the list of products.
- Deleted "When applied as a tank mixture for bare ground, etc"
- Changed "bermudagrass" to "Bermudagrass" in several places in book.
- First weed in table - corrected spelling of "Anoda".
- Corrected alphabetization of "Bassia, fivehook"

"This notification with minor revisions is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes (besides what is stated herein) have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

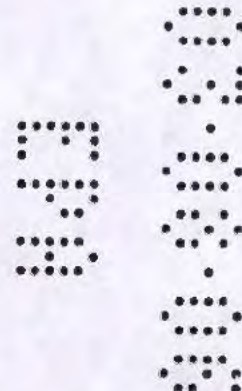
If you have any questions regarding this submission, please feel free to contact me through Dr. Russell P. Schneider or directly at 314-694-9036.

Sincerely,



Debra Hinton
Registration Specialist

cc: R. Schneider
D. Fee-White





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

303834

Application for Pesticide - Section I

1. Company/Product Number Monsanto Company / 524-535	2. EPA Product Manager Mr. James Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) QuikPro Herbicide	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I (Eye) Street, N.W., Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Final printed label booklet
Print Plate No. 98005E4-12/53

REGULATORY.AFFAIRS@MONSANTO.COM

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	Other (Specify) _____	
		If "Yes" Package wgt	No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Dr. Russell P. Schneider		Title Director, Regulatory Affairs	
		Telephone No. (Include Area Code) (202) 383-2866	
<p>Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>			
2. Signature 		3. Title Registration Specialist	
4. Typed Name Debra Hinton		5. Date March 6, 2006	
<p>6. Date Application Received (Stamped)</p>			

QuikPRO[®]
Herbicide

Powered by **Roundup**
TECHNOLOGY™

Best One on Weeds.
GO For Quick Action.

**24 hours
after treatment**

f children.

See back panel for additional
precautionary statements.

el

S

ION!

vi)
nium salt 73.3%
pyridox
romide] 2.9%
..... 23.8%
100.0%

glyphosate,
contains
salt of glyphosate
salt of diquat.

and Spanish Instructions.
léas y para las instrucciones españolas.

NET 6.8 LBS

wt, not volume.

98005D5-9/53



AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS OR FRUIT OF CROPS, DESIRABLE PLANTS AND TREES, BECAUSE SEVERE INJURY OR DESTRUCTION MAY RESULT.

FOR PRODUCT INFORMATION OR ASSISTANCE
IN USING THIS PRODUCT, CALL TOLL-FREE:
1-800-332-3111

PRECAUTIONARY STATEMENTS

Hazards to Humans and
Domestic Animals

Keep out of reach of children.

CAUTION!

HARMFUL IF SWALLOWED. HARMFUL IF
INHALED. CAUSES MODERATE EYE IRRITATION.

Avoid breathing dust or spray mist. Avoid
contact with eyes or clothing. Remove
contaminated clothing and wash clothing
before reuse. Wash thoroughly with soap
and water after handling.

FIRST AID

IF SWALLOWED	<ul style="list-style-type: none"> • Call a physician or Poison Control Center for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a Poison Control Center or physician. • Do not give anything by mouth to an unconscious person. • Quick treatment is essential to counteract poisoning and should be initiated before signs and symptoms of injury appear.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a Poison Control Center or physician for further treatment advice.
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a Poison Control Center or physician for treatment advice.
	<ul style="list-style-type: none"> • Have the product container or label with you when calling a Poison Control Center or physician, or going for treatment. • You may also contact (314) 694-4000 collect day or night, for emergency medical treatment information. • This product is identified as QuikPRO herbicide, EPA Registration No. 524-535.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This product is toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment/wastewater.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations.

Keep all unprotected persons out of operating areas or vicinity where there may be drift.

Keep people and pets off treated areas until spray solution has dried.

Storage and Disposal

Do not contaminate water, foodstuffs, feed or seed by storage or disposal.

Keep container closed to prevent spills and contamination.

DISPOSAL: Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state, or local procedures.

Emptied container retains vapor and product residue. Observe all labeled safeguards until container is destroyed.

Do not reuse container. Triple rinse container, then puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

See label booklet for complete PRECAUTIONARY LANGUAGE, PPE, and PHYSICAL OR CHEMICAL HAZARDS and COMPLETE DIRECTIONS FOR USE.

98005D1-27/53WQ

MONSANTO



ing this product. Use only according to label

TY AND LIABILITY" statement, which appears
ing or using. If terms are not acceptable, return

CT. MONSANTO DOES NOT INTEND AND HAS
FORMULATION OR REPACKAGING.

up Technology, Monsanto and the Vine Symbol
Technology LLC.

in the U.S. with U.S. ingredients

USA



MONSANTO



March 1, 2006

Document Processing Desk (NOTIF)
Registration Division - H7505C
U.S. Environmental Protection Agency
1801 South Bell Street
Crystal Mall #2, Room 266A
Arlington, Virginia 22202-4501

MONSANTO COMPANY
1300 I (EYE) STREET, NW
SUITE 450 EAST
WASHINGTON, D.C. 20005
PHONE (202) 485-2866
FAX (202) 760-1748
<http://www.monsanto.com>

Attention: Mr. James A. Tompkins
Product Manager 25

Subject: **MON 78365 Herbicide QuikPRO Herbicide; EPA Reg. No. 524-535**
Notification of Final Printed Container labeling Marketing Claims

Dear Mr. Tompkins:

Monsanto herein notifies the Agency of a revised final printed container label for QuikPRO Herbicide, print plate 90005D5-9/53 (front panel label) and 90005D1-27/53WC (back panel label). This container label set contains precautionary based on the EPA Stamped label dated May 12, 2003. The following marketing claims and dual language references have been added to the front panel label:

Pull a Fast One on Weeds.
QuikPRO For Quick Action.
24 hours after treatment [describing photograph of dying weed.]
Keep out of reach of children and signal word are duplicated in Spanish
See Product booklet for English and Spanish Instructions added in English and Spanish
Container filled by weight, not volume.

Notification of marketing statements on container label only per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

This notification is classified as part of the Agency's Fast-Track Program and therefore no fee is due. The following documents are included with this notification:

Application for Pesticide (form 8570-1)
One copy of final printed label

If you should have any questions regarding this submission, please call Dr. Russell P. Schneider at (202) 383-2866 or call me at (314) 694-6576.

Sincerely,

Dawn Fee-White
Registration Manager

Cc Russ Schneider



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number
303833

Application for Pesticide – Section I

1. Company/Product Number 524-535	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MON 78365; QUIKPRO HERBICIDE / Monsanto Company	PM # 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I Street, NW; Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section – II

☐ Amendment – Explain below.
☐ Resubmission in response to Agency letter dated
☐ Notification – Explain below.

☐ Final printed labels in response to Agency letter dated
☐ "Me Too" Application.
☒ Other – Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Monsanto believes this is a fast-track notification with no associated PRIA fee. Please e-mail any fee requirement response to Regulatory.Affairs@Monsanto.com. Notification of marketing statements on final printed container label.

I certify that the packaging that will be used for this product meets the standards of 40 CFR 157.32.

Section – III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. 6.8 lb No. per Container 2	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per Container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 6.8 lb	5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Other polyethylene adhesive			

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Russell P. Schneider Ph.D.	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (202) 383-2866
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name Dawn M. Fee-White	5. Date 1 March 2006	



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☐ Other

OPP Identifier Number

303833

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name)	PM#	
5. Name and Address of Applicant (Include ZIP Code) <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name	Title	Telephone No. (Include Area Code)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature	3. Title	
4. Typed Name	5. Date	



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number
303827

Application for Pesticide – Section I

1. Company/Product Number 524-535	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MON 78365; QUIKPRO HERBICIDE / Monsanto Company	PM # 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I Street, NW; Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification – Explain below.	<input checked="" type="checkbox"/> Other – Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Monsanto believes this is a fast-track notification with no associated PRIA fee. Please e-mail any fee requirement response to Regulatory.Affairs@Monsanto.com. Notification of final printed label.

I certify that the packaging that will be used for this product meets the standards of 40 CFR 157.32.

Section – III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 6.8 lb	No. per Container 2	If "Yes" Package wgt.	No. per Container
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 6.8 lb		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product in mold labeling with labeling under measuring cap		<input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section – IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Russell P. Schneider Ph.D.		Title Director, Regulatory Affairs		Telephone No. (Include Area Code) (202) 383-2866	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped)	
2. Signature 		3. Title Registration Manager			
4. Typed Name Dawn M. Fee-White		5. Date 26 January 2006			

MONSANTO



MONSANTO COMPANY

1700 I (EYE) STREET, NW
SUITE 450 EAST
WASHINGTON, D.C. 20005
PHONE (202) 383-2866
FAX (202) 789-1748
<http://www.monsanto.com>

February 8, 2005

Document Processing Center
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Attention: Mr. James A. Tompkins
Team Leader (25)

Subject: **MON 78365 Herbicide**
QuikPRO Herbicide
EPA Reg. No. 524-535
Determination on Applicability of Child Resistant Packaging
Requirements

Dear Mr. Tompkins:

On January 13, 2005, Dr. Russell Schneider, Mr. Tom Carratto, Monsanto Associate General Counsel, and I, met with Dr. Rosalind Gross and Ms. Vickie Walters to review Monsanto's request for an exemption from child-resistant packaging requirements (Letter dated November 8, 2004) pursuant to 40 CFR Part 157.24(b), for formulations currently approved under EPA registration number 524-535.

We would like to thank Dr. Gross and Ms. Walters for their time and we greatly appreciate their efforts in explaining the process for such exemption requests and Dr. Gross' suggested alternatives for how Monsanto might proceed on this matter.

During our meeting, it was suggested that Monsanto seek a determination from the Registration Division as to whether or not the CRP requirements for acute inhalation toxicity are applicable to MON 78365 herbicide (alternate brand name: QuikPRO herbicide), considering that 1) the acute inhalation toxicity study could not be conducted on the dry product as commercially packaged and 2) there is essentially no concern for inhalation exposure as only a negligible percentage (0.002%) of particles from this dry product are in the respirable range of less than 10 microns.

As stated in our exemption request letter dated November 8, 2004, due to its physical characteristics there is no practical means by which to determine the acute inhalation LC₅₀ value of the undiluted granular product. In addition, given that there are essentially no particles in the respirable range, young children who may come in contact with the packaged product would experience negligible exposure via inhalation. For these reasons, there is no risk of serious injury or illness from accidental exposure to this product that would be reduced by the use of child-resistant packaging. Thus, Monsanto believes that the formulation currently approved under this registration should not be subject to child-resistant packaging requirements on the basis of the acute inhalation LC₅₀ as determined in the submitted study (MRID 45434304). According to Dr. Gross, an evaluation of this information and a subsequent determination would appropriately be made by the technical reviewer in the Technical Review Branch who originally reviewed the acute toxicity studies supporting this registration approval.

Because of the ambiguity that exists with regard to the applicability of the CRP standards to this product, Monsanto is in the process of researching packaging options for this product. While the above request is being considered by the Agency, Monsanto intends to begin immediately with our next scheduled production utilizing child-resistant packaging for both package SKUs of QuikPRO herbicide.

If you have any questions regarding this request feel free to contact me through Dr. Russell P. Schneider at 202-383-2866 or directly at 314-694-8890.

Sincerely,



Annette M. Kirk
Registration Manager

cc: R.P. Schneider
J.B. Winski

Rosalind
Gross/DC/USEPA/US
01/13/2005 03:55 PM

To Vickie Walters/DC/USEPA/US@EPA
cc Deborah Mccall@EPA, John Redden@EPA
bcc
Subject Monsanto EPA 524-535, CRP, and acute inhalation tox

Vicki

After the meeting with Russ Schneider, and the other two people from Monsanto I spoke with my boss Debbie McCall about the situation. I pointed out the fact that EPA 524-535 was only subject to CRP based on acute inhalation toxicity $LC50 > 0.99$ mg/l. I noted the product as sold could not be subjected to the inhalation test. I indicated that the test study used 50% w/v solution in water. I noted that Monsanto said this is not representative of the true hazard and they claim only 0.002% of particles in respirable range of <10 microns. Debbie agreed that this would not qualify as CRP exemption request and it is better handled thru PM as a request that toxicity (inhalation) **test does not represent the true hazard of this particular product this time** and that TRB could evaluate this argument and make a determination as to whether or not this product is **subject to CRP regulations and needs CRP** in a reasonable time period.

You may want to convey this information to Russ as it may influence what Monsanto does. I am sorry didn't have piece of information at the meeting, but never having seen their request prior to meeting didn't know that it was an inhalation toxicity/particle size issue.

Thanks.

Rosalind Gross
Registration Division
CM-2, Room 262
1801 South Bell St.
Arlington, VA 22202
telephone 703-308-7368
fax 703-308-9382
email gross.rosalind@epa.gov



Jim Tompkins/DC/USEPA/US
01/10/2005 03:11 PM

To "SCHNEIDER, RUSSELL P [AG/1920]"
<russell.p.schneider@monsanto.com>
cc Vickie Walters/DC/USEPA/US@EPA, Rosalind
Gross/DC/USEPA/US@EPA
bcc
Subject Re: meeting on Thursday

Room 1014 Crystal Mall 2
"SCHNEIDER, RUSSELL P [AG/1920]" <russell.p.schneider@monsanto.com>



"SCHNEIDER, RUSSELL P
[AG/1920]"
<russell.p.schneider@monsanto.com>
01/10/2005 02:36 PM

To Jim Tompkins/DC/USEPA/US@EPA
cc
Subject meeting on Thursday

Jim,

Rosalind Gross has agreed to meet with us, as well as with you and Vickie on Thursday at 1:30. However, she and Vickie agreed that you had to get a room. Is that acceptable?

Russ

MONSANTO



MONSANTO COMPANY

1300 I (EYE) STREET, NW

SUITE 450 EAST

WASHINGTON, D.C. 20005

PHONE (202) 383-2866

FAX (202) 789-1748

<http://www.monsanto.com>

November 8, 2004

Hand Delivered

Document Processing Center
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Attention: Mr. James A. Tompkins
Team Leader (25)

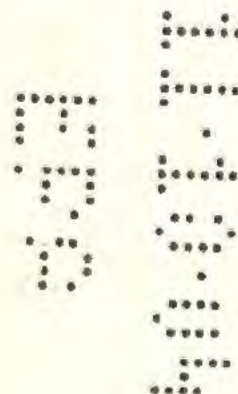
Subject: **QuikPRO Herbicide**
EPA Reg. No. 524-535
Request for Exemption from the Requirement for Child Resistant
Packaging; 40 CFR 157 Subpart B

Dear Mr. Tompkins:

Pursuant to 40 CFR Part 157.24(b), Monsanto requests an exemption from child-resistant packaging requirements for formulations currently approved under EPA registration number 524-535.

The 524-535 registration was first approved by the Agency on October 31, 2001. This registration includes the brand names: MON 78365 Herbicide and QuikPRO Herbicide, as well as the distributor supplemental product: Lesco Prosecutor Swift Acting Herbicide (EPA Reg. No. 524-535-10404). The most recent version of the Master Label for this registration was approved by the Agency on May 12, 2003. A proposed amendment to the Master Label, submitted June 21, 2004, to further reduce the PPE requirements, is pending approval (D-344884).

In a recent review of the acute toxicity results for the MON 78365 formulation (MRIDs: 45434302-07), we noticed that although the results for the Acute Nose-only Inhalation Toxicity Study fall into Toxicity Category III for precautionary labeling, the combined LC₅₀ value was less than 2 mg/liter (calculated LC₅₀ > 0.99 mg/liter). This result is a trigger based



on the toxicity criterion listed in 40 CFR 157.22 that requires a product be distributed and sold in child-resistant packaging, if it meets the additional criteria for "residential use."

However, for the following reasons, we believe that with respect to this registration, the hazard indicated by the acute inhalation toxicity criterion in 40 CFR 157.22(a)(3) is not indicative of the true hazard to man, including young children, and further, there is no risk of serious injury or illness from accidental exposure to this product that child-resistant packaging would reduce:

1. QuikPRO herbicide is not intended for homeowner use.

QuikPRO is a product that is sold into the Turf and Ornamental market for use by professional applicators; most typically lawn care operators. QuikPRO is labeled for use in residential areas but it is not a homeowner use product. QuikPRO is available for sale to end-users only through retail establishments specializing in the sale of pesticide products to golf course superintendents and lawn care and landscape management companies, such as Lesco, Helena and UAP. Although these large-scale distributor companies have locations that are open to the general public, their primary targeted customers are not homeowners. It would be very rare for the average homeowner to purchase pesticide products from one of these companies for use in and around his home.

2. The inhalation toxicity study result for QuikPRO is not indicative of the actual inhalation hazard to man, in particular for young children that might encounter the product in its packaged, granular form

The formulation that is QuikPRO herbicide is a water soluble dry granule containing ammonium glyphosate and diquat dibromide plus surfactant (designated as MON 78365).

Because the QuikPRO formulation contains surfactant, the dry granules have a very "sticky" consistency and thus produce no significant dust. The results of a preliminary particle size analysis of the dry granules, not reported in the acute inhalation study final report, estimated that only about 0.002% of the particles were in the respirable range of less than 10 microns, confirming the lack of any significant dust generated from this product. Table 2 is attached here from the particle-size analysis report (Monsanto report no. MSL 17246) showing the cumulative grams (0.0009g) of an initial 50.2 gram sample that were found to be less than 10 microns.

When considering the acute inhalation study results, it must be noted that attempts by the testing laboratory to generate a respirable atmosphere using the straight dry product failed due the sticky consistency of the granules, making it necessary for the laboratory to essentially "force fit" the test material by using a 50% w/v solution in deionized water in order to conduct the inhalation study.

Although the actual inhalation LC50 value for the undiluted granular product cannot be determined using currently available equipment and techniques, in practical terms, there

should be no concern for acute exposure to QuikPRO via inhalation. Child-resistant packaging for QuikPRO would only guard against accidental exposure to the product in its packaged, granular form and young children who may encounter the packaged product will not prepare a solution, so they cannot logically be exposed to a material that is comparable to that used in the inhalation study.

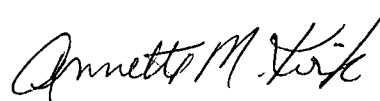
Dissolution of the product granules into water, in order to permit completion of the required acute inhalation study, did overcome the physical limitation that the particles were not respirable. Thus the calculated LC_{50} value (> 0.99 mg/liter) does characterize a potential hazard, *if the particles could be respired*, and therefore represents an upper-bound estimate of the inhalation hazard posed by accidental exposure to the undiluted granules. This worst-case estimate of the hazard is an appropriate basis for determining the required precautionary and first-aid label statements for this product. However, for real-world use conditions that take into account the physical nature of the granules, the inhalation study result does not represent the true inhalation hazard potential. Plus the accidental exposure of a young child to the concentrated granular product would more likely be by the oral or dermal route, and not by inhalation. Therefore, the more appropriate acute hazard end-points to consider in regard to child-resistant packaging for this product are acute oral and acute dermal toxicity. Based on the results of acute oral and acute dermal toxicity studies for the MON 78365 formulation (MRIDs: 45434302 and -03), LD50 values of 4443 mg/kg body wt., and greater than 5000 mg/kg body wt., were calculated for oral and dermal toxicity, respectively. Neither of these results triggers the respective toxicity criterion for requiring child-resistant packaging under 40 CFR 157.22.

In summary, the likelihood of a homeowner purchasing and having QuikPRO in his home is very low and in addition, the likelihood of inhalation exposure to respirable particles of QuikPRO for a young child who encounters the product container is essentially zero. Further Monsanto believes that the inhalation toxicity study results for QuikPRO are not indicative of the actual inhalation hazard to man in its packaged, granular form, and hereby requests an exemption from child-resistant packaging for the formulation currently approved under the 524-535 registration for the duration of the registration of this product.

We believe that this request is not subject to a Registration Service Fee. If the Agency decides otherwise, please inform Monsanto of the fee amount necessary to complete this action by sending an email message to: regulatory.affairs@monsanto.com

If you have any questions regarding this submission feel free to contact me through Dr. Russell P. Schneider at 202-383-2866 or directly at 314-694-8890.

Sincerely,



Annette M. Kirk
Registration Manager

Table 2
Particle-Size Analysis from Andersen Impactor (MON 78365)

<u>Stage Number</u>	<u>Effective Cutoff Diameter (um)</u>	<u>Weight Percent Collected</u>	<u>Cumulative Percent Less Than Cutoff</u>	<u>Sample Weight (grams)</u>
Pre	10.00	35.71	64.29	0.0005
0	9.00	0.00	64.29	0.0000
1	5.80	0.00	64.29	0.0000
2	4.70	0.00	64.29	0.0000
3	3.30	0.00	64.29	0.0000
4	2.10	14.29	50.00	0.0002
5	1.10	0.00	50.00	0.0000
6	0.65	14.29	35.72	0.0002
7	0.43	21.43	14.29	0.0003
Filter	0.00	14.29	0.00	0.0002

Total Sample Weight: 0.0014 g

MMAD: 1.9 um

GSD: 2.6

Sample used for impactor analysis was 0.0047grams of MON 78365 less than 127 microns.

um = micron



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

9 A 8.1

Jacket

June 10, 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-344884
EPA File Symbol or Registration Number: 524-535
Product Name: MON 78365 HERBICIDE
EPA Receipt Date: 08-Jun-2004
EPA Company Number: 524
Company Name: MONSANTO COMPANY

RUSSELL P. SCHNEIDER
MONSANTO CO
MONSANTO COMPANY
1300 I STREET, NW, SUITE 450 EAST
WASHINGTON, DC 20005

SUBJECT: Receipt of Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for Amendment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R35

NON-FAST TRACK (CHANGES TO REI;PPE;PHI;RATE AND NUMBER OF APPLICATIONS;ADD AERIAL APPLICATION;MODIFY GW/SW ADVISORY STATEMENT;

Please remit payment in the amount of: \$ 10,000 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

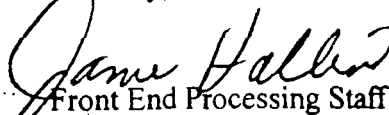
By Courier:
U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman, at (703) 305-6249.

Sincerely,


Front End Processing Staff

Information Resources and Services Division

Fee for Service

This package includes the following:

☐ New FFS Action

☒ Amendment

☐ Waiver Request

☐ Voluntary Payment Request

for Division:

☒ RD

☐ AD

☐ PPE

Receipt Nos. S- 761829

Product/Risk Manager: PM-25

EPA File Symbol/Reg. No. 524-535

Pjn-Punch Date: 6-8-04

☐ This item is NOT subject to FFS action.

Action Code: R-35

Amount Due: \$ 10,000⁰⁰

Voluntary Payment Reduction Amount:

☐ 0%

☐ 10%

☐ 20%

☐ 25%

☐ 30%

☐ 40%

☐ 50%

☐ 60%

☐ 70%

☐ 75%

☐ 80%

☐ 90%

☐ 100%

☐ Other

☐ %

Original Decision #:

D- _____

Reviewer: J. Miller

Date: 6-10-04

Remarks:

*Residential applicator exposure assessment
submitted to support reduction in PPE.*



MONSANTO COMPANY

600 13TH STREET, N.W.

SUITE 600

WASHINGTON, D.C. 20005

<http://www.monsanto.com>

April 26, 2004

Document Processing Center (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Attention: Mr. James A. Tompkins
Team Leader (25)

Subject: QuikPro Herbicide (EPA Reg. No. 524-535)
Submission of Final Printed Label

Dear Mr. Tompkins:

Monsanto is submitting for your files three (3) copies of the final printed label booklet for QuikPro Herbicide (EPA Reg. No. 524-535, Print Plate No. 98005B1-12/53). This label is approved text from the EPA stamped label (524-535) dated October 31, 2001. Minor update is the Spanish text. Monsanto certifies that this text is an accurate translation of the English.

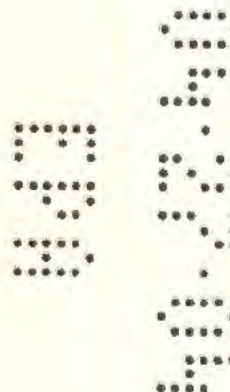
"This notification with minor revisions is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes (besides what is stated herein) have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

If you have any questions regarding this submission, please feel free to contact me through Dr. Russell P. Schneider or directly at 314-694-9036.

Sincerely,

Debra Hinton
Registration Specialist

cc: R. Schneider
A. Kirk





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

265159

Application for Pesticide - Section I

1. Company/Product Number Monsanto / 524-535	2. EPA Product Manager Mr. James Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) QuikPro Herbicide	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 600 13th Street, N.W., Suite 660 Washington, DC 20005 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Final printed label booklet
Print Plate No. 9800581-12/53

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
If "Yes" Unit Packaging wgt. _____ No. per container _____		If "Yes" Package wgt. _____ No. per container _____		<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container _____		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dr. Russell P. Schneider	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (202) 783-2660
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Registration Specialist	
4. Typed Name Debra Hinton	5. Date April 26, 2004	

98005B1-12/53



Complete Directions for Use

EPA Reg. No. 524-535

AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS OR FRUIT OF CROPS, DESIRABLE PLANTS AND TREES, BECAUSE SEVERE INJURY OR DESTRUCTION MAY RESULT.

2004-1

Read the entire label before using this product.

Use only according to label instructions.

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

Read the "LIMIT OF WARRANTY AND LIABILITY" statement at the end of the label before buying or using. If terms are not acceptable, return at once unopened.

THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION OR REPACKAGING.

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1.0 INGREDIENTS

ACTIVE INGREDIENTS:

*Glyphosate, N-(phosphonomethyl)	
glycine, in the form of its ammonium salt	73.3%
Diquat dibromide [6,7-dihydrodipyrido	
(1,2-a:2',1'-c) pyrazinedium dibromide]	2.9%
OTHER INGREDIENTS:	23.8%
	100.0%

*Equivalent to 66.6% of the acid, glyphosate

1.0 pound of QuikPRO® herbicide contains 0.73 pound of the ammonium salt of glyphosate and 0.03 pound of the dibromide salt of diquat.

Patent(s) pending. No license granted under any non-U.S. patent(s).

2.0 IMPORTANT PHONE NUMBERS

1. FOR PRODUCT INFORMATION OR ASSISTANCE IN USING THIS PRODUCT, CALL TOLL-FREE,
1-800-332-3111.
2. IN CASE OF AN EMERGENCY INVOLVING THIS PRODUCT, OR FOR MEDICAL ASSISTANCE, CALL COLLECT, DAY OR NIGHT,
1-(314)-694-4000.

3.0 PRECAUTIONARY STATEMENTS

3.1 Hazards to Humans and Domestic Animals

Keep out of reach of children.

CAUTION!

HARMFUL IF SWALLOWED.

HARMFUL IF INHALED.

CAUSES MODERATE EYE IRRITATION.

Avoid breathing dust or spray mist.

Avoid contact with eyes or clothing.

Remove contaminated clothing and wash clothing before reuse.

Wash thoroughly with soap and water after handling.

FIRST AID

If Swallowed

- Call a physician or Poison Control Center for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a Poison Control Center or physician.
- Do not give anything by mouth to an unconscious person.
- **QUICK TREATMENT IS ESSENTIAL TO COUNTERACT POISONING** and should be initiated before signs and symptoms of injury appear.

If Inhaled

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
- Call a Poison Control Center or physician for further treatment advice.

If In Eyes

- Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a Poison Control Center or physician for treatment advice.

- Have the product container or label with you when calling a Poison Control Center or physician, or going for treatment.
- You may also contact (314) 694-4000, collect day or night, for emergency medical treatment information.
- This product is identified as **QuikPRO® herbicide**, EPA Registration No. 524-535.

DOMESTIC ANIMALS: Keep livestock and pets out of treated areas. Do not graze livestock on treated areas. This product is considered to be relatively nontoxic to dogs and other domestic animals; however, ingestion of this product or large amounts of freshly sprayed vegetation may result in temporary gastrointestinal irritation (vomiting, diarrhea, colic, etc.). If such symptoms are observed, provide the animal with plenty of fluids to prevent dehydration. Call a veterinarian if symptoms persist for more than 24 hours.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow restrictions for Category A on an EPA Chemical Resistant Category selection chart.

Applicators and other handlers must wear: Coveralls over short-sleeved shirt and short pants or coveralls over long-sleeved shirt and long pants, chemical-resistant gloves Category A, such as butyl rubber, natural rubber, neoprene rubber, or nitrile rubber ≥ 14 mils, chemical-resistant footwear plus socks, protective eyewear, chemical resistant headgear for overhead exposure and chemical-resistant apron when cleaning equipment, mixing or loading. Discard clothing and other materials that have been heavily contaminated with this product's concentrate. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

3.2 Environmental Hazards

This product is toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

3.3 Physical or Chemical Hazards

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations.

Keep all unprotected persons out of operating areas or vicinity where there may be drift.

Do not enter or allow entry of maintenance workers into treated areas, or allow contact with treated vegetation wet with spray solution, dew or rain, without appropriate protective clothing for 24 hours, and to prevent transfer of this product onto desirable vegetation.

4.0 STORAGE AND DISPOSAL

Do not contaminate water, foodstuffs, feed or seed by storage or disposal.

Keep container closed to prevent spills and contamination.

Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state, or local procedures.

Emptied container retains vapor and product residue. Observe all labeled safeguards until container is cleaned, reconditioned, or destroyed.

Do not reuse container. Triple rinse container, then puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

5.0 GENERAL INFORMATION (How this product works)

Product Description: This product is a postemergent, systemic herbicide with no soil residual activity. It is generally non-selective and gives broad spectrum control of many annual weeds, perennial weeds, woody brush and trees. It is formulated as a water-soluble granule containing surfactant and no additional surfactant is needed or recommended. It may be applied through most standard sprayers after dissolution and thorough mixing with water according to label instructions.

Time to Symptoms: This product moves through the plant from the point of foliage contact to and into the root system. Visible effects on most annual weeds occur within 1 day, and on most perennial weeds in 2 days. Extremely cool or cloudy weather following treatment may slow activity of this product and delay development of visual symptoms. Visible effects are a quick yellowing of the foliage which advances to complete browning of above-ground growth and deterioration of underground plant parts.

Mode of Action: One of the active ingredients in this product inhibits an enzyme found only in plants and microorganisms that is essential to formation of specific amino acids. A second active rapidly disrupts cell integrity of photosynthetically active tissues in the contacted foliage.

Cultural Considerations: Reduced control may result when applications are made to annual or perennial weeds that have been mowed, grazed, or cut, and have not been allowed to regrow to the recommended stage for treatment.

Rainfastness: Heavy rainfall soon after application may wash this product off of the foliage and a repeat application may be required for adequate control.

Spray Coverage: For best results, spray coverage should be uniform and complete. Do not spray weed foliage to the point of runoff.

No Soil Activity: Weeds must be emerged at the time of application to be controlled by this product. Weeds germinating from seed after application will not be controlled. Unemerged plants arising from unattached underground rhizomes or root stocks of perennials will not be affected by the herbicide and will continue to grow.

Tank Mixing: This product does not provide residual weed control. For subsequent residual weed control, follow a label-approved herbicide program. Read and carefully observe the cautionary statements and all other information appearing on the labels of all herbicides used. Use according to the most restrictive label directions for each product in the mixture.

Buyer and all users are responsible for all loss or damage in connection with the use or handling of mixtures of this product with herbicides or other materials that are not expressly recommended in this labeling. Mixing this product with herbicides or other materials not recommended on this label may result in reduced performance.

Annual Maximum Use Rate: For noncrop uses, the combined total of all treatments must not exceed 12.25 pounds of this product per acre per year.

ATTENTION

AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS OR FRUIT OF CROPS, DESIRABLE PLANTS AND TREES, BECAUSE SEVERE INJURY OR DESTRUCTION MAY RESULT.

AVOID DRIFT. EXTREME CARE MUST BE USED WHEN APPLYING THIS PRODUCT TO PREVENT INJURY TO DESIRABLE PLANTS AND CROPS.

Do not allow the herbicide solution to mist, drip, drift or splash onto desirable vegetation since minute quantities of this product can cause severe damage or destruction to the crop, plants or other areas on which treatment was not

intended. The likelihood of injury occurring from the use of this product increases when winds are gusty, as wind velocity increases, when wind direction is constantly changing or when there are other meteorological conditions that favor spray drift. When spraying, avoid combinations of pressure and nozzle type that will result in splatter or fine particles (mist) which are likely to drift. **AVOID APPLYING AT EXCESSIVE SPEED OR PRESSURE.**

NOTE: Use of this product in any manner not consistent with this label may result in injury to persons, animals or crops, or other unintended consequences. Keep container closed to prevent spills and contamination.

6.0 MIXING

Clean sprayer parts immediately after using this product by thoroughly flushing with water.

NOTE: REDUCED RESULTS MAY OCCUR IF WATER CONTAINING SOIL IS USED, SUCH AS VISIBLY MUDDY WATER OR WATER FROM PONDS AND DITCHES THAT IS NOT CLEAR.

Use caution to avoid siphoning back into the carrier source. Use approved anti-back-siphoning devices where required by state or local regulations. During mixing and application, foaming of the spray solution may occur. To prevent or minimize foam, avoid the use of mechanical agitators, terminate by-pass and return lines at the bottom of the tank and, if needed, use an approved antifoam or defoaming agent.

6.1 Procedure for Preparing Spray Solution

Use the following procedure to mix this product in water alone or when preparing tank mixtures with other labeled products.

1. Place a 20 to 35 mesh screen or wetting basket over filling port.
2. Through the screen, fill the spray tank one-half full with water and start agitation.
3. Add QuikPRO herbicide using a circular motion while pouring.
4. If second product is a wettable powder, first make a slurry with the water carrier, then add the slurry SLOWLY through the screen into the tank. Continue agitation.
5. If a flowable formulation is used, premix one part flowable with one part water. Add diluted mixture SLOWLY through the screen into the tank. Continue agitation.
6. If an emulsifiable concentrate formulation is used, premix one part emulsifiable concentrate with two parts water. Add diluted mixture slowly through the screen into the tank. Continue agitation.
7. Continue filling the spray tank with water and add water soluble liquids near the end of the filling process.

When tank mixing QuikPRO herbicide with other products, maintain good agitation at all times until the contents of the tank are sprayed. If the spray mixture is allowed to settle, thorough agitation is required to resuspend the mixture before spraying is resumed.

Keep by-pass line on or near the bottom of the tank to minimize foaming. Screen size in nozzle or line strainers should be no finer than 50 mesh.

Always predetermine the compatibility of labeled tank mixtures of this product with water carrier by mixing small proportional quantities in advance.

Refer to the "Tank Mixing" section of "GENERAL INFORMATION" for additional precautions.

6.2 Mixing for Hand-Held Sprayers

Prepare the desired volume of spray solution by adding the desired amount of this product as shown in the following table to a clean, empty sprayer. Add the appropriate amount of water and stir or agitate to ensure dissolution of QuikPRO herbicide. For use in backpack sprayers, it is suggested that the recommended amount of this product be mixed with water in a larger container. Fill sprayer with the mixed solution.

Spray Solution

Amount of QuikPRO herbicide

Desired

Volume	Annuals	Perennials	Brush	Low Volume, Directed	
1 Gal	1.2 oz	1.5 oz	1.5 oz	4.0 oz	8.0 oz
3 Gal	3.6 oz	4.5 oz	4.5 oz	12.0 oz	1.5 lb
10 Gal	12.0 oz	15.0 oz	15.0 oz	2.5 lb	5.0 lb

6.3 Colorants or Dyes

Agriculturally-approved colorants or marking dyes may be added to this product. Colorants or dyes used in spray solutions of this product may reduce performance, especially at lower rates or dilution. Use colorants or dyes according to the manufacturer's recommendations. Certain blue dyes are not stable in the spray solution in the presence of this product. A jar test to determine if the desired blue dye is stable is recommended. If stability is a problem consider switching to an alternate color dye.

6.4 Drift Control Additives

Drift control additives may be used with all equipment types. When a drift control additive is used, read and carefully

observe the cautionary statements and all other information appearing on the additive label.

7.0 APPLICATION EQUIPMENT AND TECHNIQUES

SPRAY DRIFT MANAGEMENT

AVOID DRIFT. EXTREME CARE MUST BE USED WHEN APPLYING THIS PRODUCT TO PREVENT INJURY TO DESIRABLE PLANTS AND CROPS.

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment- and weather-related factors determine the potential for spray drift. The applicator and the grower are/is responsible for considering all these factors when making decisions.

Do not apply this product by air.

Do not apply this product through any type of irrigation system.

Do not allow the herbicide solution to mist, drip, drift or splash onto desirable vegetation since minute quantities of this product can cause severe damage or destruction to the crop, plants or other areas on which treatment was not intended.

APPLY THESE SPRAY SOLUTIONS IN PROPERLY MAINTAINED AND CALIBRATED EQUIPMENT CAPABLE OF DELIVERING DESIRED VOLUMES.

7.1 Ground Broadcast Equipment

Use the recommended rates of this product in 10 to 80 gallons of water per acre as a broadcast spray unless otherwise specified. As density of weeds increases, spray volume should be increased within the recommended range to ensure complete coverage. Carefully select proper nozzles

to avoid spraying a fine mist. For best results with ground application equipment, use flat fan nozzles. Check for even distribution of spray droplets.

7.2 Hand-Held and High-Volume Equipment

Apply to foliage of vegetation to be controlled. For applications made on a spray-to-wet basis, spray coverage should be uniform and complete. Do not spray to the point of runoff. Use coarse sprays only.

For control of weeds listed in the "Annual Weeds" section of "WEEDS CONTROLLED", apply 1.2 ounces of this product per 1 gallon of spray solution. See table in hand-held mixing Section 6.2 for larger mixing volumes.

For best results, use 1.5 ounces of this product per 1 gallon of spray solution on harder-to-control perennials, such as Bermudagrass, dock, field bindweed, hemp dogbane, milkweed and Canada thistle. See table in hand-held mixing Section 6.2 for larger mixing volumes.

For low volume, directed spray applications, use 4.0 to 8.0 ounces of this product per 1 gallon of spray solution for control or partial control of brush weeds. See table in hand-held mixing Section 6.2 for larger mixing volumes. Spray coverage should be uniform with at least 50 percent of the foliage contacted. Coverage of the top one half of the plant is important for best results. To ensure adequate spray coverage, spray both sides of brush and tree seedlings when foliage is thick and dense, or where there are multiple sprouts.

8.0 SITE AND USE RECOMMENDATIONS

Detailed instructions follow alphabetically, by site.

Unless otherwise specified, applications may be made to control any weeds listed in the annual, perennial and woody brush tables.

8.1 General Noncrop Areas and Industrial Sites

Use in noncrop and non-timber areas only, such as airports, apartment complexes, ditch banks, dry ditches, dry canals, fencerows, golf courses, lumberyards, manufacturing sites, office complexes, parks, parking areas, recreational areas, residential areas, schools, storage areas, warehouse areas, other public areas, and similar industrial and noncrop sites.

This product is **not** for use on crops, timber, or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

General Weed Control, Trim-and-edge and Bare Ground

This product may be used in general noncrop areas. It may be applied with any application equipment described in this label. This product may be used to trim-and-edge around objects in noncrop sites, for spot treatment of unwanted vegetation and to eliminate unwanted weeds growing in established shrub beds or ornamental plantings. This product may be used prior to planting an area to ornamentals, flowers, turfgrass (sod or seed), or prior to laying asphalt or beginning construction projects. This product is **not** for use on plants grown for sale or other commercial use, or for commercial seed production.

Repeated applications of this product may be used, as weeds emerge, to maintain bare ground.

Dormant Turfgrass

This product may be used to control or suppress many winter annual weeds and tall fescue for effective release of dormant Bermudagrass and bahiagrass turf. Treat only when turf is dormant and prior to spring greenup. This product is not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Apply 5 to 16 ounces of this product per acre. Apply the recommended rates in 10 to 80 gallons of water per acre. Use only in areas where Bermudagrass or bahiagrass are desirable ground covers and where some temporary injury or discoloration can be tolerated.

Treatments in excess of 9 ounces per acre may result in injury or delayed greenup in highly maintained areas, such as golf courses and lawns.

Turfgrass Renovation (Except for Commercial Sod Farms)

This product controls most existing vegetation prior to renovating turfgrass areas. This product is not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes. For maximum control of existing vegetation, delay planting or sodding to determine if any regrowth from escaped underground plant parts occurs. Where repeat treatments are necessary, sufficient regrowth must be attained prior to application. **Do not use this product for renovation of Bermudagrass or kikuyugrass sods.** Where existing vegetation is growing under mowed turfgrass management, apply this product after omitting at least one regular mowing to allow sufficient growth for good interception of the spray.

Do not disturb soil or underground plant parts before treatment. Tillage or renovation techniques such as vertical mowing, coring or slicing should be delayed for 7 days after application to allow translocation into underground plant parts.

Desirable turfgrasses may be planted following the above procedures.

Hand-held equipment may be used for spot treatment of unwanted vegetation growing in existing turfgrass.

Do not feed or graze treated turfgrass or feed treated thatch to livestock.

8.2 Parks, Recreational and Residential Areas

This product may be used in parks, recreational and residential areas. It may be applied with any application equipment described in this label. This product may be used to trim-and-edge around trees, fences, paths, around buildings, sidewalks, and other objects in these areas. This product may be used for spot treatment of unwanted vegetation. This product may be used to eliminate unwanted weeds growing in established shrub beds or ornamental plantings. This product may be used prior to planting an area to ornamentals, flowers, turfgrass (sod or seed), or prior to laying asphalt or beginning construction projects.

All of the instructions in the 'General Noncrop Areas and Industrial Sites' section apply to park and recreational areas. This product is not for use around plants being grown for sale or other commercial use.

9.0 WEEDS CONTROLLED

Always use the higher rate of this product per acre within the recommended range when weed growth is heavy or dense or weeds are growing in an undisturbed (noncultivated) area.

Reduced results may occur when treating weeds heavily covered with dust. For weeds that have been mowed, grazed or cut, allow regrowth to occur prior to treatment.

Refer to the following label sections for recommended rates for the control of annual and perennial weeds. For difficult to control perennial weeds and where plants are growing under stressed conditions, or where infestations are dense, this product may be used at up to 12.25 pounds per acre for enhanced results.

9.1 Annual Weeds

Use 4.5 pounds per acre of this product as a broadcast spray to control annual weeds.

For spray-to-wet applications, apply 1.2 ounces of this product per 1 gallon of spray solution.

WEED SPECIES

Anoda, spurred	Copperleaf,
Barley*	hophornbeam
Barnyardgrass*	Corn*
Bittercress*	Corn speedwell*
Black nightshade*	Crabgrass*
Bluegrass, annual*	Dwarf dandelion*
Bluegrass, bulbous*	Eastern manna grass*
Bassia, fivehook	Eclipta*
Brome, downy*	Fall panicum*
Brome, Japanese*	Falsedandelion*
Browntop panicum*	False flax, small seed*
Buttercup*	Fiddleneck
Carolina foxtail*	Field pennycress*
Carolina geranium	Filaree
Castor bean	Fleabane, annual*
Cheatgrass*	Fleabane, hairy
Cheeseweed	(<i>Conyza bonariensis</i>)*
(<i>Malva parviflora</i>)	Fleabane, rough*
Chervil*	Florida pusley
Chickweed*	Foxtail*
Cocklebur*	Goatgrass, jointed*

Goosegrass	Russian thistle
Grain sorghum (milo)*	Rye*
Groundsel, common*	Ryegrass*
Hemp sesbania	Sandbur, field*
Henbit	Shattercane*
Horseweed/Marestail (<i>Gonyza canadensis</i>)	Shepherd's-purse*
Itchgrass*	Sicklepod
Johnsongrass, seedling	Signalgrass, broadleaf*
Junglerice	Smartweed, ladysthumb*
Knotweed	Smartweed, Pennsylvania*
Kochia	Sowthistle, annual
Lamb's-quarters*	Spanishneedles
Little barley*	Speedwell, purslane*
London rocket*	Sprangletop*
Mayweed	Spurge, annual
Medusahead*	Spurge, prostrate*
Morningglory	Spurge, spotted*
(<i>Ipomoea</i> spp.)	Spurry, umbrella*
Mustard, blue*	Starthistle, yellow
Mustard, tansy*	Stinkgrass*
Mustard, tumble*	Sunflower*
Mustard, wild*	Teaweed/Prickly sida
Oats	Texas panicum*
Pigweed*	Velvetleaf
Plains/Tickseed coreopsis*	Virginia copperleaf
Prickly lettuce*	Virginia pepperweed*
Purslane, common	Wheat*
Ragweed, common*	Wild oats*
Ragweed, giant	Witchgrass*
Red rice	Woolly cupgrass*
	Yellow rocket*

*When using field broadcast equipment (boom sprayers using flat-fan nozzles) these species will be controlled or partially controlled using 4.5 pounds of this product per acre. Applications must be made using 10 to 80 gallons of

carrier volume per acre. Use nozzles that ensure thorough coverage of foliage and treat when weeds are in an early growth stage.

9.2 Perennial Weeds

Best results are obtained when perennial weeds are treated after they reach the reproductive stage of growth (seedhead initiation in grasses and bud formation in broadleaves). For nonflowering plants, best results are obtained when the plants reach a mature stage of growth. In many situations, treatments are required prior to these growth stages. Under these conditions, use the higher application rate within the recommended range.

Use 9.0 pounds per acre of this product as a broadcast spray to control perennial weeds.

For spray-to-wet applications, apply 1.5 ounces of this product per 1 gallon of spray solution. Ensure thorough coverage when using spray-to-wet treatments using hand-held equipment.

When using hand-held equipment for low volume, directed spot treatments, apply 4.0 to 8.0 ounces of this product per 1 gallon of spray solution.

Allow 7 or more days after application before tillage.

WEED SPECIES

Alfalfa*	Bindweed, field
Alligatorweed*	Bluegrass, Kentucky
Anise (fennel)	Blueweed, Texas
Bahiagrass	Bromegrass, smooth
Beachgrass, European (<i>Ammophila arenaria</i>)	Bursage, woolly-leaf
Bentgrass*	Canarygrass, reed
Bermudagrass*	Cattail
Bermudagrass, water (knotgrass)	Glover, red, white*
	Cogongrass
	Dallisgrass

Dandelion	Nutsedge, purple, yellow
Dock, curly	Orchardgrass
Dogbane, hemp	Pampasgrass
Fescue (except tall)	Paragrass
Fescue, tall	Pepperweed, perennial
German ivy	Phragmites*
Guineagrass	Poison hemlock
Horsenettle	Quackgrass
Horseradish	Redvine*
Iceplant	Reed, giant
Jerusalem artichoke	Ryegrass, perennial
Johnsongrass	Spurge, leafy*
Kikuyograss*	Thistle, artichoke
Knapweed	Thistle, Canada
Lantana	Timothy
Lespedeza	Torpedograss*
Milkweed, common	Trumpetcreeper*
Muhly, wirestem	Vaseygrass
Mullein, common	Velvetgrass
Napiergrass	Wheatgrass, western
Nightshade, silverleaf	

*Partial Control

9.3 Brush Weeds and Tree Seedlings

Best results are obtained when brush weeds are treated when they are in the seedling stage of growth. In many situations, retreatment is required on larger plants. Under these conditions, use the higher application rate within the recommended range.

Use 9.0 pounds per acre of this product as a broadcast spray to control brush weeds.

For spray-to-wet applications, apply 1.5 ounces of this product per 1 gallon of spray solution. Ensure thorough coverage when using spray-to-wet treatments using hand-held equipment.

When using hand-held equipment for low volume, directed spot treatments, apply 4.0 to 8.0 ounces of this product per 1 gallon of spray solution.

Allow 7 or more days after application before tillage.

WEED SPECIES

Alder	Oak, southern red
Ash*	Peppertree, Brazilian
Beach*	(Florida holly)*
Birch	Pine
Blackberry	Poison ivy*
Blackgum	Poison oak*
Cherry, bitter, black, pin	Poplar, yellow*
Dogwood*	Redbud, eastern
Elderberry	Rose, multiflora
Elm*	Saltcedar*
Honeysuckle	Sumac; laurel, poison,
Locust, black*	smooth, sugarbush,
Maple, red	winged*
Maple, sugar	Sweetgum
Oak, black, white*	Vine maple*
Oak, northern pin	Virginia creeper
Oak, post	Waxmyrtle, southern*
Oak, Scrub*	

*Partial control

10.0 LIMIT OF WARRANTY AND LIABILITY

Monsanto Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in the Complete Directions for Use label booklet ("Directions") when used in accordance with those Directions under the conditions described therein. NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated herein.

Buyer and all users shall promptly notify this Company of any claims whether based in contract, negligence, strict liability, other tort or otherwise.

Buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those set forth in the Directions, application to or contact with desirable vegetation, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the product is applied, as well as weather conditions which are outside the application ranges set forth in the Directions, application in any manner not explicitly set forth in the Directions, moisture conditions outside the moisture range specified in the Directions, or the presence of products other than those set forth in the Directions in or on the soil, crop or treated vegetation.

This Company does not warrant any product reformulated or repackaged from this product except in accordance with this Company's stewardship requirements and with express written permission from this Company.

THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF THE LIABILITY OF THIS COMPANY OR ANY OTHER SELLER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY OTHER SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

Upon opening and using this product, buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement. If terms are not acceptable, return at once unopened.

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Patents pending. No license granted under any
non-U.S. patent(s).

EPA Reg. No. 524-535

In case of an emergency involving this product,
Call Collect, day or night, (314) 694-4000.

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ST. LOUIS, MISSOURI, 63167 U.S.A.

MONSANTO



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Registro en la EPA N° 524-535

En caso de que se presente una emergencia relacionada con este producto, llame por cobrar a cualquier hora del día o de la noche, al teléfono (314)-694-4000.

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Instrucciones completas para el uso

Registro en la EPA N° 524-535

EVITE EL CONTACTO DEL HERBICIDA CON EL FOLLAJE, TALLOS VERDES, RAICES NO LENOSAS EXPUESTAS O FRUTOS EXPUESTOS DE LAS COSECHAS, PLANTAS Y ARBOLES DESEABLES. EN CASO CONTRARIO ES PROBABLE QUE SUFRAN GRAVES DAÑOS O SEAN DESTRUIDOS TOTALMENTE.

Antes de usar este producto, lea la etiqueta en su totalidad. Úselo solamente de acuerdo con las instrucciones de la etiqueta. El uso de este producto de cualquier manera contraria a las indicaciones contenidas en este libreto se considera una violación de las leyes federales.

Antes de comprar o usar el producto, lea "LÍMITES EN LA GARANTÍA Y EN LA RESPONSABILIDAD" en la última sección de la etiqueta. Si las condiciones son inaceptables para usted, devuelva el producto inmediatamente sin abrir el recipiente.

ESTE ES UN PRODUCTO PARA USARSE TAL Y COMO ESTA PREPARADO. MONSANTO NO LO HA DISEÑADO NI LO HA REGISTRADO PARA QUE SEA REFORMULADO NI VUELTO A ENVASAR.

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1.0 INGREDIENTES

INGREDIENTE ACTIVO:

* Glifosato, N-(fosfonometil)glicina, en forma de su
sal de amonio 73.3%

Dibromuro de dicuat [dibromuro de
6,7-dihidrodipirido (1,2-a:2',1'-c) pirazidinio] 2.9%

OTROS INGREDIENTES: 23.8%

100.0%

* Equivalente a 66.6% de ácido glifosato

1.0 libra del herbicida QuikPRO® contiene 0.73 libras de la sal glifosato de amonio y 0.03 libras de la sal dibromuro de dicuat.

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2.0 TELEFONOS IMPORTANTES

1. PARA INFORMACION SOBRE EL PRODUCTO O AYUDA PARA UTILIZAR ESTE PRODUCTO, LLAME GRATIS AL
1-800-332-3111.
2. EN CASO DE QUE SE PRESENTE UNA EMERGENCIA RELACIONADA CON ESTE PRODUCTO, O PARA OBTENER AYUDA MEDICA, LLAME POR COBRAR A CUALQUIER HORA DEL DIA O DE LA NOCHE, AL TELEFONO
(314)-694-4000.

3.0 ADVERTENCIAS

3.1 Riesgos para seres humanos y animales domésticos

Manténgase fuera del alcance de los niños.

¡PRECAUCION!

NOCIVO SI SE INGIERE.

NOCIVO SI SE INHALA.

PROVOCA IRRITACIÓN OCULAR MODERADA.

Evite respirar el polvo o neblinas de aspersión.

Evite el contacto con los ojos y con la ropa.

Quítese la ropa contaminada y lávese antes de volver a usarla.

Déspués de manejar el producto, lávese a fondo con agua y jabón.

PRIMEROS AUXILIOS

Si es ingerido	<ul style="list-style-type: none"> • Llame a un centro de envenenamientos o a un médico para que le indique el tratamiento. • Si la persona puede tragar, hágale beber poco a poco un vaso de agua. • No induzca el vómito, a menos que así se lo indique el médico o el centro de envenenamientos. • No administre nada por la boca a una persona que haya perdido el conocimiento. • UN TRATAMIENTO RÁPIDO ES ESENCIAL PARA CONTRARRESTAR LA INTOXICACIÓN y se debe iniciar antes de que se manifiesten los signos y síntomas de daño.
Si es inhalado	<ul style="list-style-type: none"> • Saque a la persona al aire fresco. • Si la persona no respira, llame al 911 o a una ambulancia; luego adminístrele respiración artificial, preferentemente boca a boca, si es posible. • Llame a un centro de envenenamientos o a un médico para que le indique el tratamiento posterior.
Si entra en contacto con los ojos	<ul style="list-style-type: none"> • Mantenga abiertos los ojos y enjuáguelos lenta y cuidadosamente con agua durante 15 a 20 minutos. Si está usando lentes de contacto, quíteselos, después de que transcurran 5 minutos, y continúe enjuagando los ojos. • Llame a un centro de envenenamientos o a un médico para que le indique el tratamiento.

- Tenga a mano el envase o la etiqueta del producto cuando llame al centro de envenenamientos o al médico, o cuando vaya para que le indiquen el tratamiento.
- También puede llamar por cobrar al teléfono (314) 694-4000, durante el día o la noche, para obtener información sobre el tratamiento médico de urgencia.
- Este producto está identificado como herbicida QuikPRO, N° de Registro de la EPA 524-535.

ANIMALES DOMESTICOS: Mantenga al ganado y a las mascotas fuera de las áreas tratadas. No ponga a pastar al ganado en áreas tratadas. Este producto se considera relativamente no tóxico para los perros y otros animales domésticos; sin embargo, la ingestión de este producto o de grandes cantidades de vegetación recientemente tratada puede causar irritación gastrointestinal temporal (vómitos, diarrea, cólicos, etc.). Si se observan dichos síntomas, dé al animal suficiente cantidad de líquidos para evitar la deshidratación. Si los síntomas continúan por más de 24 horas, llame al veterinario.

Equipo de protección personal:

A continuación se indican algunos materiales resistentes a las sustancias químicas que contiene este producto. Si desea más opciones, consulte las restricciones de la Categoría A en una tabla de selección de la EPA de la categoría de resistencia a los productos químicos.

Las personas que lo apliquen y otros manipuladores deben usar: overoles sobre camisas de manga corta y pantalones cortos u overoles sobre camisas de manga larga y pantalones largos, guantes de material resistente a los productos químicos categoría A, como los de caucho butílico, caucho natural (hule), neopreno o caucho nitrilo de un espesor de más de 14 mil, calzado resistente a los productos químicos y calcetines, protección ocular, casco de material resistente a los productos químicos cuando la cabeza esté expuesta y delantal de material resistente a los productos químicos al limpiar el equipo, mezclar o cargar. Deseche la

ropa y otros materiales que se hayan contaminado mucho con el concentrado de este producto. Siga las instrucciones del fabricante para limpiar y mantener el equipo de protección personal (PPE). En caso de no tener dichas instrucciones para prendas lavables, use detergente y agua caliente. Mantenga y lave el equipo de protección personal separado de las demás prendas a lavarse.

Recomendaciones de seguridad para el usuario:

El usuario debe:

- Lavarse las manos antes de comer, beber, mascar goma, usar tabaco o de usar el servicio higiénico.
- Quitarse de inmediato la ropa si el pesticida pasa a través de la misma. Luego lávese cuidadosamente y póngase ropa limpia.
- Quitarse el equipo de protección personal (PPE) de inmediato, después de manipular este producto. Lave la parte exterior de los guantes antes de quitárselos. Lávese muy bien y póngase ropa limpia tan pronto como sea posible.

3.2 Riesgos al medio ambiente

Este producto es tóxico para los invertebrados acuáticos. No aplique directamente al agua, en áreas donde el agua superficial esté presente o en áreas donde haya mareas altas y bajas por debajo del nivel medio de mareas altas. No contamine el agua cuando deseché el agua con la cual lavó el equipo.

3.3 Riesgos de orden físico o químico

Para mezclar, almacenar y aplicar la solución de este producto, se deben usar solamente recipientes de acero inoxidable.

able, aluminio, fibra de vidrio, plástico o recipientes de acero recubiertos internamente con plástico.

NO MEZCLE, ALMACENE O APLIQUE ESTE PRODUCTO O SUS SOLUCIONES PARA ROCIAR EN RECIPIENTES O TANQUES ROCIADORES DE ACERO GALVANIZADO O DE ACERO NO RECUBIERTO (EXCEPTO SI ES ACERO INOXIDABLE).

Este producto o la solución para rociar reaccionan con el material de dichos recipientes y tanques, lo cual produce hidrógeno, que puede formar una mezcla de gases altamente combustibles. Si esta mezcla de gases entra en contacto con llamas, chispas, el soplete de un soldador, un cigarrillo encendido o cualquier otra fuente de encendido, puede inflamarse o explotar y causar heridas graves a personas.

INSTRUCCIONES PARA EL USO

El uso de este producto de cualquier manera que sea inconsistente con las instrucciones dadas en la etiqueta es una violación de las leyes federales. No aplique este producto de alguna manera que entre en contacto con los trabajadores u otras personas, ya sea directamente o por medio de alguna corriente de aire. Solamente las personas que usen equipo protector podrán estar en el área durante su aplicación. Para verificar requisitos específicos de su tribu o estado, consulte con la agencia responsable de la regulación del uso de pesticidas.

Mantenga a todas las personas que no tengan protección fuera de las áreas de trabajo o de las inmediaciones de las zonas donde pueda producirse el acarreo del producto.

Durante 24 horas, no ingrese ni permita el ingreso del personal de mantenimiento en las áreas tratadas, ni permita el contacto con la vegetación tratada que esté mojada con la solución de pulverización, el rocío o la lluvia, sin ropa de protección adecuada, para evitar transferir este producto a la vegetación deseable.

4.0 ALMACENAMIENTO Y DESECHO

Cuando almacene o deseche el producto no contamine el agua, los productos alimenticios, el alimento para animales o las semillas.

Mantenga los recipientes bien cerrados para evitar derramamientos y contaminación.

Los desechos que resulten del uso de este producto que no puedan utilizarse o reprocesarse químicamente deben eliminarse en un vertedero de basura aprobado para la eliminación de pesticidas o de acuerdo con los procedimientos locales, estatales y federales aplicables.

El recipiente vaciado retiene vapores y residuos del producto. Observe todas las precauciones de la etiqueta hasta que el recipiente esté destruido.

No reutilice el recipiente. Enjuague tres veces el recipiente, luego perforélo y deséchelo en un vertedero de basura sanitario o por incineración, ó, si lo permiten las autoridades estatales y locales, quemándolos. Si se queman, permanezca lejos del humo.

5.0 INFORMACION GENERAL (Cómo funciona este producto)

Descripción del producto: Este producto es un herbicida postemergente sistémico sin actividad residual sobre la tierra. En general no es selectivo y brinda un control de amplio espectro sobre muchas malas hierbas anuales y perennes, árboles y matorrales leñosos. Está formulado como un granulado soluble en agua que contiene surfactante, y no necesita ni se recomienda surfactante adicional. Se puede aplicar con la mayoría de los pulverizadores estándar.

dar después de haberto diluido y mezclado completamente con agua según las instrucciones de la etiqueta.

Período para la aparición de síntomas: Este producto se desplaza por la planta desde el punto de contacto con el follaje hasta el sistema radicular y dentro de éste. En la mayoría de las malezas anuales los efectos visibles aparecen en 1 día, y en la mayoría de las malezas perennes en 2 días. El clima muy frío o nublado a continuación del tratamiento puede retardar la actividad de este producto y demorar la aparición de síntomas visuales. Los efectos visibles son la rápida aparición de color amarillo en el follaje, que avanza hasta que la vegetación que está por encima de la tierra queda toda de color marrón, y el deterioro de las partes subterráneas de la planta.

Modo de acción: Uno de los ingredientes activos en este producto inhibe a una enzima que solo se encuentra en las plantas y en los microorganismos y que es esencial para la síntesis de aminoácidos específicos. Un segundo ingrediente activo rompe rápidamente la integridad celular de los tejidos del follaje con el que entra en contacto, que llevan a cabo la fotosíntesis.

Prácticas culturales: Se podrá observar una reducción en el efecto si se aplica el producto a malezas anuales o perennes que hayan sido segadas, que hayan servido de alimento para animales o hayan sido cortadas, y que no hubiesen crecido nuevamente hasta el nivel recomendado para el tratamiento.

Resistencia a la lluvia: La lluvia torrencial poco después de la aplicación lavará el producto del follaje y se requerirá una nueva aplicación para obtener un control adecuado.

Cobertura de la pulverización: Para obtener mejores resultados, la cobertura de la pulverización debe ser completa y uniforme. No pulverice el follaje de la maleza hasta el punto de escurrimiento.

Sin actividad sobre la tierra: Las malezas deben haber emergido en el momento de la aplicación para poder ser

controladas por este producto. Las malezas que germinan de semillas después de la aplicación no serán controladas. Las plantas no emergidas con rizomas o raíces subterráneas de malezas perennes no conectadas no se verán afectadas por el herbicida, y seguirán creciendo.

Mezclas de tanque: Este producto no proporciona control residual de malezas. Para lograr un control residual subsecuente, utilice un programa herbicida con una etiqueta que esté aprobado. Lea y siga cuidadosamente todas las precauciones indicadas y toda la información que aparezca en las etiquetas de los herbicidas que use. Uselos según las instrucciones más restrictivas de la etiqueta de cada producto usado en la mezcla.

El comprador y todos los usuarios son responsables por todas las pérdidas o daños que resulten del uso o manejo de las mezclas de este producto con herbicidas u otros materiales que no estén expresamente recomendados en este libreto. La mezcla de este producto con herbicidas u otros materiales que no estén recomendados en este libreto puede reducir la eficacia de este producto.

Proporción de uso máximo anual: Para usos que no sean en los cultivos, el total combinado de todos los tratamientos no debe superar las 12.25 libras de este producto por acre por año.

ATENCIÓN

EVITE EL CONTACTO DEL HERBICIDA CON EL FOLLAJE, TALLOS VERDES, RAICES NO LEÑOSAS EXPUESTAS O FRUTOS EXPUESTOS DE LAS COSECHAS, PLANTAS Y ARBOLES DESEABLES. EN CASO CONTRARIO ES PROBABLE QUE SUFRAN GRAVES DAÑOS O SEAN DESTRUIDOS TOTALMENTE.

EVITE EL ACARRREO. CUANDO EL PRODUCTO SE APLIQUE, SE DEBE TENER MUCHO CUIDADO PARA PREVENIR EL DAÑO A PLANTAS Y CULTIVOS DESEABLES.

No permita que la solución del herbicida se nebulice, gotee, sea acarreada o salpique sobre la vegetación deseable. Una cantidad pequeña puede ser suficiente para causar daños graves o destruir las cosechas, plantas u otras áreas que no se desea tratar. La probabilidad de que ocurran daños por el uso de este producto aumenta cuando hay muchas ráfagas de viento, a medida que aumenta la velocidad del viento, cuando la velocidad del viento cambia constantemente o cuando existen otras condiciones meteorológicas que favorecen la dispersión del rociado. Cuando se esté aplicando el producto con un rociador, evite la combinación de presiones y tipos de boquilla que puedan dar como resultado salpicaduras o partículas finas (niebla), que tienen muchas probabilidades de que el producto sea acarreado. **EVITE LA APLICACION A ALTA VELOCIDAD O PRESION EXCESIVAS.**

NOTA: El uso de este producto de cualquier manera contraria a las indicaciones contenidas en este libretto, puede resultar en lesiones a personas, animales o cosechas o pueden ocurrir otras consecuencias no deseadas. Mantenga los recipientes bien cerrados para evitar derramamientos y contaminación.

6.0 Mezclas

Limpie las piezas del rociador inmediatamente después de su utilización lavándolas bien con agua.

NOTA: PUEDE OCURRIR UNA DISMINUCION DE LOS RESULTADOS SI SE UTILIZA AGUA QUE CONTENGA TIERRA, TAL COMO AGUA CON BARRO VISIBLE O AGUA DE CHARCAS O ACEQUIAS QUE NO ESTE CLARA.

Tenga cuidado para evitar el reflujo en la fuente portadora. Utilice aparatos aprobados contra el reflujo en lugares donde lo exijan las normas locales o estatales. Durante la mezcla y

aplicación, se puede formar espuma en la solución de pulverización. Para prevenir o minimizar la formación de espuma, evite el uso de agitadores mecánicos, cierre las tuberías de retorno y de paso en la parte posterior del tanque, y en caso de que sea necesario, utilice un agente aprobado antiespuma o que elimina la espuma.

6.1 Procedimiento para la preparación de la solución de pulverización

Utilice el siguiente procedimiento para mezclar este producto *sólo con agua o cuando prepare mezclas para tanque con otros productos rotulados.*

1. Coloque una canasta de remojo o criba (alambrado) de malla de 20 a 35 sobre el puerto de llenado.
2. A través de la criba, llene el tanque del pulverizador por la mitad con agua y comience a agitar.
3. Agregue el herbicida QuikPRO realizando un movimiento circular mientras lo vierte.
4. Si el segundo producto es un polvo mezclable con agua, primero haga una pasta con el portador de agua, luego agregue LENTAMENTE la pasta a través de la criba (alambrado) dentro del tanque. Continúe agitando.
5. Si se usa una formulación fluida, mezcle previamente una parte fluida con una parte de agua. Agregue la mezcla diluida LENTAMENTE a través de la criba (alambrado) dentro del tanque. Continúe agitando.
6. Si se usa un concentrado emulsionable, mezcle previamente una parte del concentrado emulsionable con dos partes de agua. Agregue lentamente la mezcla diluida a través de la criba (alambrado) en el tanque. Continúe agitando.

7. Continúe llenando el tanque del pulverizador con agua y agregue líquidos solubles en agua cerca del final del proceso de llenado.

Cuando mezcle en tanque el herbicida QuikPRO con otros productos, agite bien durante todo el tiempo hasta que el contenido del tanque sea pulverizado. Si se deja que la mezcla para rociar se asiente, agite bien para que la mezcla vuelva a estar en suspensión antes de continuar con el rociado.

A fin de minimizar la formación de espuma, mantenga las tuberías de retorno lo más cerca del fondo del tanque. El tamaño de la malla en la boquilla o de las mallas en las tuberías no debe ser menor al número 50.

Siempre determine previamente la compatibilidad de la mezcla de este producto, que viene en tanque rotulado, con agua como vehículo mezclando cantidades pequeñas proporcionales con anticipación.

Vea la sección "Mezclas de Tanque" de "INFORMACION GENERAL" para las precauciones adicionales.

6.2 Mezcla para rociadores de mano o mochila de espalda

Prepara el volumen deseado de la solución de pulverización agregando la cantidad conveniente de este producto a un pulverizador limpio y vacío, agregue la cantidad de agua adecuada como se muestra en la tabla siguiente. Revuelva o agite para asegurar la disolución del herbicida QuikPRO. Para usar en pulverizadores tipo mochila, se sugiere que la cantidad recomendada de este producto se mezcle con agua en un recipiente más grande. Llene el pulverizador con la solución mezclada.

Solución de pulverización

Volumen Conveniente	Cantidad de herbicida QuikPRO				
	Anuales	Perennes	Malezas arborescentes	Bajo volumen, dirigido	
1 Gal	1.2 oz	1.5 oz	1.5 oz	4.0 oz	8.0 oz
3 Gal	3.6 oz	4.5 oz	4.5 oz	12.0 oz	1.5 lb
10 Gal	12.0 oz	15.0 oz	15.0 oz	2.5 lb	5.0 lb

6.3 Colorantes o tinturas

A este producto se le pueden agregar colorantes o tinturas para marcar, que sean aprobados para uso agrícola. Los colorantes o tinturas utilizados en las soluciones en roció de este producto pueden reducir su rendimiento, especialmente a bajas concentraciones del producto o a bajas diluciones. Para usar los colorantes o tinturas siga las instrucciones del fabricante. Algunos colorantes azules no son estables en la solución de pulverización en presencia de este producto. Se recomienda una prueba de probeta ("jar test") para determinar si el colorante azul deseado es estable. Si la estabilidad es un problema, considere cambiar a un colorante de color alternativo.

6.4 Aditivos para controlar el acarreo del producto

Se pueden utilizar aditivos que ayuden a controlar el acarreo del producto durante la aplicación con todo tipo de equipo. Al utilizar un aditivo para controlar el acarreo, lea y cumpla meticulosamente con las cláusulas preventivas y toda la demás información que aparece en la etiqueta del aditivo.

7.0 EQUIPOS Y TECNICAS PARA LA APLICACION

MANEJO DE LA DERIVA POR ROCIADO

EVITE LA DERIVA. DEBE USARSE EXTREMO CUIDADO EN LA APLICACIÓN DE ESTE PRODUCTO PARA EVITAR DAÑOS A PLANTAS Y CULTIVOS DESEADOS.

Es la responsabilidad del aplicador evitar la deriva por rociado en el lugar de aplicación. La interacción de varios factores relacionados con el clima y el equipo determina la posibilidad de deriva por rociado. El aplicador y el cultivador son responsables de considerar todos estos factores al tomar decisiones.

No aplique este producto por aire.

No use ningún sistema de irrigación para aplicar este producto.

No permita que la solución del herbicida empañe, gotee, se derive o salpique sobre la vegetación deseada, ya que minúsculas cantidades de este producto pueden causar daños graves o destrucción del cultivo, plantas u otras áreas que no se pretendía tratar.

APLIQUE ESTAS SOLUCIONES PARA ROCIAR UTILIZANDO EQUIPOS DEBIDAMENTE MANTENIDOS Y CALIBRADOS QUE SEAN CAPACES DE ROCIAR EL VOLUMEN DESEADO.

7.1 Equipo de aplicación terrestre

Use las proporciones recomendadas de este producto con 10 a 80 galones de agua por acre para rociar de manera diseminada, a menos que se indique de otra manera en este librito. A medida que la densidad de las malezas aumenta, el volumen de rociado se debe aumentar también para conseguir una cobertura completa, pero siempre dentro de los

límites recomendados. A fin de evitar un rociado muy fino, seleccione la boquilla cuidadosamente. Para obtener mejores resultados con equipo a nivel del terreno, use boquillas tipo abanico plano. Asegúrese de que las gotas del rociado se distribuyan uniformemente.

7.2 Equipo de mano y de alto volumen

Aplique el producto al follaje de la vegetación que se desea controlar. En aplicaciones de rociado para mojar, la cobertura del follaje debe ser completa y uniforme. No rocíe hasta el punto en que el producto gotee de la vegetación. Use rociadores gruesos solamente.

Para el control de las malezas indicadas en la sección "Malezas anuales" de "MALEZAS CONTROLADAS", aplique 1,2 onzas de este producto por 1 galón de solución de pulverización. Consulte la tabla en la Sección 6.2, mezcla manual, para volúmenes mayores de mezcla.

Para obtener mejores resultados, utilice 1,5 onzas de este producto por 1 galón de solución de pulverización en plantas perennes más difíciles de controlar, como *Cynodon dactylon* (bermudagrass), *Rumex* spp. (dock), *Convolvulus arvensis* (field bindweed), *Apocynum cannabinum* (hemp dogbane), *Asclepias* spp. (milkweed) y *Cirsium arvense* (Canada thistle). Consulte la tabla en la Sección 6.2, mezcla manual, para volúmenes mayores de mezcla.

En aplicaciones de rociado dirigido de bajo volumen, use de 4,0 a 8,0 onzas de este producto por 1 galón de solución de pulverización, para el control o el control parcial de malezas arbustivas. Consulte la tabla en la Sección 6.2, mezcla manual, para volúmenes mayores de mezcla. La cobertura de la pulverización debe ser uniforme y debe entrar en contacto con el 50 por ciento del follaje por lo menos. Para obtener mejores resultados, es importante cubrir la mitad superior

RECOMENDACIONES SEGUN AREAS Y USO 18

de la planta. Para asegurar que la pulverización alcance una cobertura adecuada, pulverice ambos lados de las plántulas de las malezas arbustivas y árboles cuando el follaje esté tupido y espeso, o donde haya múltiples brotes.

8.0 RECOMENDACIONES SEGUN AREAS Y USO

A continuación aparecen las instrucciones detalladas para cada área.

A menos que se especifique lo contrario, pueden hacerse aplicaciones para controlar las malezas listadas en las tablas de malezas anuales, perennes y matorrales leñosos.

8.1 Áreas generales no cultivables y áreas industriales

Utilice solamente en áreas que no sean boscosas ni se usen para cultivos, como aeropuertos, complejos de viviendas, márgenes de zanjas, zanjas secas, canales secos, franjas de tierra sin cultivar que se encuentran a los lados y debajo de las cercas, campos de golf, depósitos de madera, terrenos industriales, complejos de oficinas, parques, zonas de estacionamiento, áreas recreativas, zonas residenciales, escuelas, áreas de almacenamiento, áreas de depósito, otras áreas públicas y sitios industriales y que no se utilicen para cultivos, similares.

Este producto **no** se debe usar en cultivos ni bosques, ni en otro tipo de vegetación que se cultive para la venta u otro uso comercial, ni para la producción de semillas comerciales, ni con fines de investigación.

Control general de malezas, recortado de bordas y suelo limpio de malezas

Este producto puede usarse en áreas generales no cul-

tivables. Puede aplicarse con cualquiera de los equipos descritos en este librito. Puede usarse para el recortado de bordes alrededor de objetos en áreas no cultivables, para tratamiento localizado de vegetación no deseable y para eliminar las malezas no deseables que crecen en cuadros de arbustos establecidos y plantaciones ornamentales. Este producto puede usarse antes de plantar un área con plantas ornamentales, flores, césped (tepes o semillas), o antes de colocar asfalto o de comenzar un proyecto de construcción.

Este producto **no** se debe usar en plantas que se cultiven para la venta u otro uso comercial, ni para la producción de semillas comerciales.

Pueden hacerse aplicaciones repetidas de este producto, a medida que emergen las malezas, para mantener el suelo limpio de malezas.

Césped dormitante

Este producto puede usarse para controlar o suprimir muchas malezas anuales de invierno y (*Festuca arundinacea*) tall festue para el alivio eficaz de céspedes de bermudagrass y bahiagrass dormientes. Trate solamente cuando el césped esté dormiente y antes de reverdecer en la primavera. Este producto no se debe usar en césped que se cultive para la venta u otro uso comercial como tepes o terrones de pasto, ni para la producción de semillas comerciales, ni con fines de investigación.

Aplique entre 5 y 16 onzas de este producto por acre. Aplique las proporciones recomendadas en 10 a 80 galones de agua por acre. Utilicelo sólo en áreas donde bermudagrass o bahiagrass sean coberturas de terreno convenientes y donde pueda tolerarse algún daño temporal o descoloración.

Los tratamientos que superen las 9 onzas por acre pueden dar como resultado el daño o la demora para verdear en áreas muy conservadas, como campos de golf o céspedes.

RECOMENDACIONES SEGUN AREAS Y USO 20

Renovación de césped (Excepto en plantaciones comerciales de césped)

Este producto controla la mayoría de la vegetación existente antes de la renovación de áreas de césped. Este producto no se debe usar en césped que se cultive para la venta u otro uso comercial como tepes o terrones de pasto, ni para la producción de semillas comerciales, ni con fines de investigación. Para lograr el máximo control de la vegetación existente, demorar la siembra o la cobertura con césped de un terreno para determinar si se produjo algún rebrote a partir de partes subterráneas de plantas que se salvaron. En las áreas donde sea necesario repetir los tratamientos, debe haber suficiente rebrote antes de la aplicación. No use este producto para la renovación de céspedes de las especies *Cynodon dactylon* (bermudagrass) y *Pennisetum clandestinum* (kikuyugrass). En los lugares donde la vegetación existente crece bajo un manejo de corte periódico, aplique este producto después de omitir al menos una siega habitual de modo que crezca lo suficiente para que la pulverización actúe con eficacia.

No remueva la tierra ni las partes de la planta que estén bajo tierra antes del tratamiento. La labranza o las técnicas de renovación como corte vertical, perforación o rebanado deben esperar 7 días después de la aplicación a fin de permitir la absorción adecuada en las partes de la planta que estén bajo tierra.

Pueden plantarse los céspedes deseados siguiendo los procedimientos anteriormente mencionados.

Puede utilizarse equipo de mano para el tratamiento en puntos específicos de vegetación no deseada que crezca en el césped existente.

No pastoree ni alimente al ganado con césped tratado, ni lo alimente con paja de heno tratado.

8.2 Parques, áreas recreativas y residenciales

Este producto puede usarse en parques, áreas recreativas y residenciales. Puede aplicarse con cualquiera de los equipos descritos en este librito. Puede usarse para el recortado de bordes alrededor de árboles, vallas (cercas), caminos, alrededor de edificios, aceras (banquetas) y otros objetos en estas áreas. Puede usarse para tratamiento localizado de vegetación no deseable y para eliminar las malezas no deseables que crecen en cuadros de arbustos establecidos y plantaciones ornamentales. Este producto puede usarse antes de plantar un área con plantas ornamentales, flores, césped (tepes o semillas), o antes de colocar asfalto o de comenzar un proyecto de construcción.

Todas las instrucciones de la sección "Áreas Generales No Cultivables y Áreas Industriales" son válidas para los parques y áreas recreativas. Este producto no se debe usar alrededor de plantas que se cultivan para la venta ni para otro uso comercial.

9.0 TIPOS DE MALEZAS CONTROLADAS

Use siempre la proporción más alta de este producto por acre, dentro de las proporciones recomendadas, cuando las malezas son densas o cuando crecen en un área no tocada (no cultivada).

Puede haber una disminución de los resultados cuando se traten malezas cubiertas con mucho polvo. Para las malezas que han sido segadas, pastadas o cortadas, permita que vuelvan a crecer antes del tratamiento.

Vea las secciones siguientes para las proporciones recomendadas para el control de anuales y perennes malezas. Para malas hierbas perennes difíciles de controlar y donde las plantas están creciendo bajo condiciones agresivas, o donde hay infestación intensa, este producto se puede usar en una concentración de hasta a 12.25 libras por acre para obtener mejores resultados.

9.1 Malezas anuales

Para controlar malezas anuales use 4.5 libras por acre de este producto en forma de pulverización por difusión.

Para aplicaciones de rociado para mojar, aplique 1.2 onzas de este producto por 1 galón de solución de pulverización.

ESPECIES DE MALEZAS

Anoda, spurred	Kochia
Barley*	Lamb's-quarters*
Barnyardgrass*	Little barley*
Bittercress*	London rocket*
Black nightshade*	Mayweed
Bluegrass, annual*	Medusahead*
Bluegrass, bulbous*	Morningglory
Bassia, fivehook	(<i>Ipomoea</i> spp.)
Brome, downy*	Mustard, blue*
Brome, Japanese*	Mustard, tansy*
Browntop panicum*	Mustard, tumble*
Buttercup*	Mustard, wild*
Carolina foxtail*	Oats
Carolina geranium	Pigweed*
Castor bean	Plains/Tickseed coreopsis*
Cheatgrass*	Prickly lettuce*
Cheeseweed	Purslane, common
(<i>Malva parviflora</i>)	Ragweed, common*

Chervil*	Ragweed, giant
Chickweed*	Red rice
Cocklebur*	Russian thistle
Copperleaf, nophornbeam	Rye*
Corn*	Ryegrass*
Corn speedwell*	Sandbur, field*
Crabgrass*	Shattercane*
Dwarf dandelion*	Shepherd's-purse*
Eastern mannagrass*	Sicklepod
Eclipta*	Signalgrass, broadleaf*
Fall panicum*	Smartweed, ladythumb*
Falsedandelion*	Smartweed, Pennsylvania*
Falsetflax, small/seed*	Sowthistle, annual
Fiddleneck	Spanishneedles
Field pennycress*	Speedwell, purslane*
Filaree	Sprangletop*
Fleabane, annual*	Spurge, annual
Fleabane, hairy	Spurge, prostrate*
(<i>Coryza bonariensis</i>)*	Spurge, spotted*
Fleabane, rough*	Spurry, umbrella*
Florida pusley	Starthistle, yellow
Foxtail*	Stinkgrass*
Goatgrass, jointed*	Sunflower*
Goosegrass	Teaweed/Prickly sida
Grain sorghum (milo)*	Texas panicum*
Groundsel, common*	Velvetleaf
Hemp sesbania	Virginia copperleaf
Henbit	Virginia pepperweed*
Horseweed/Marestail	Wheat*
(<i>Coryza canadensis</i>)	Wild oats*
Ichgrass*	Witchgrass*
Johnsongrass, seedling	Woolly cupgrass*
Junglerice	Yellow rocket
Knotweed	

* Cuando use equipos de aplicación diseminada a nivel del terreno (rociadores de aguijón con boquillas tipo abanico plano), estas especies serán controladas o controladas parcialmente con 4,5 libras de este producto por acre. Las aplicaciones deben hacerse usando de 10 a 80 galones de volumen por acre. Use boquillas que garanticen una cobertura completa del follaje y haga el tratamiento cuando las malezas estén en su etapa temprana de crecimiento.

9.2 Malezas perennes

Los mejores resultados se obtienen cuando las malezas perennes son tratadas una vez que han alcanzado la etapa reproductiva de su crecimiento (inicio de las semillas para hierbas y formación de yemas para malezas de hoja ancha). Para las plantas sin flores, los mejores resultados se obtienen cuando las plantas alcanzan el estado de madurez. En muchos casos, se requiere el tratamiento antes de estas etapas del crecimiento. En estos casos, use la proporción más alta dentro de las proporciones recomendadas.

Para controlar malezas perennes use 9,0 libras por acre de este producto en forma de pulverización por difusión.

Para las aplicaciones de rociado para mojar, aplique 1,5 onzas de este producto por 1 galón de solución de pulverización. Asegúrese de lograr una cobertura completa cuando efectúe tratamientos de rociado para mojar mediante equipo manual.

Cuando utilice equipo manual para tratamientos dirigidos de bajo volumen por manchas, aplique de 4,0 a 8,0 onzas de este producto por 1 galón de solución de pulverización.

Espere 7 días o más después de la aplicación antes de labrar.

ESPECIES DE MALEZAS

Alfalfa*	Johnsongrass
Alligatorweed*	Kikuyugrass*
Anise (fennel)	Knapweed
Bahiagrass	Lantana
Beachgrass, European (<i>Ammophila arenaria</i>)	Lespedeza
Bentgrass*	Milkweed, common
Bermudagrass*	Muhly, wirestem
Bermudagrass, water (knotgrass)	Mullein, common
Bindweed, field	Napiergrass
Bluegrass, Kentucky	Nightshade, silverleaf
Blueweed, Texas	Nutsedge, purple, yellow
Bromegrass, smooth	Orchardgrass
Bursage, woolly-leaf	Pampasgrass
Canarygrass, reed	Paragrass
Cattail	Pepperweed, perennial
Clover, red, white*	Phragmites*
Cogongrass	Poison hemlock
Dallisgrass	Quackgrass
Dandelion	Redvine*
Dock, curly	Reed, giant
Dogbane, hemp	Ryegrass, perennial
Fescue (except tall)	Spurge, leafy*
Fescue, tall	Thistle, artichoke
German ivy	Thistle, Canada
Guineagrass	Timothy
Horsenettle	Torpedograss*
Horseradish	Trumpet creeper*
Iceplant	Vaseygrass
Jerusalem artichoke	Velvetgrass
	Wheatgrass, western

*Control parcial

9.3 Plántulas de malezas arbustivas y árboles

Los mejores resultados se obtienen cuando las malezas arbustivas se tratan en la etapa de plántula. En muchas ocasiones es necesario volver a tratar las plantas más grandes. Bajo esas condiciones, use la dosis de aplicación más alta dentro de la gama recomendada.

Para controlar malezas arbustivas use 9,0 libras por acre de este producto en forma de pulverización por difusión.

Para aplicaciones de rociado para mojar, aplique 1,5 onzas de este producto por 1 galón de solución de pulverización. Asegúrese de lograr una cobertura completa cuando efectúe tratamientos de rociado para mojar mediante equipo manual.

Cuando utilice equipo manual para tratamientos dirigidos de bajo volumen por manchas, aplique de 4,0 a 8,0 onzas de este producto por 1 galón de solución de pulverización.

Espere 7 días o más después de la aplicación antes de labrar.

ESPECIES DE MALEZAS

Alder	Oak, Southern red
Ash*	Peppertree, Brazilian
Beech*	(Florida holly)*
Birch	Pine
Blackberry	Poison ivy*
Blackgum	Poison oak*
Cherry; bitter, black, pin	Poplar, yellow*
Dogwood*	Redbud, eastern
Elderberry	Rose, multiflora
Elm*	Saltcedar*
Honeysuckle	Sumac; laurel, poison,
Locust, black*	smooth, sugarbush,
Maple, red	winged*
Maple, sugar	Sweetgum

Oak, black, white*
Oak, northern pin
Oak, post
Oak, scrub*

Vine maple*
Virginia creeper
Waxmyrtle, southern*

*Control parcial

10.0 LIMITES EN LA GARANTIA Y EN LA RESPONSABILIDAD

Monsanto Company garantiza que este producto concuerda con la descripción química de la etiqueta y es razonablemente adecuado para los propósitos descritos en el librito titulado Instrucciones Completas para el Uso ("Instrucciones") cuando se usa de acuerdo con dichas Instrucciones y las condiciones que allí se detallan. NO SE HACE NINGUNA OTRA GARANTIA EXPRESA O IMPLICITA ACERCA DE LA IDONEIDAD PARA UN USO PARTICULAR O COMERCIABILIDAD. Esta garantía está sujeta también a las condiciones y limitaciones que aquí se indican.

El comprador y todos los usuarios deberán reportar con prontitud a esta Compañía acerca de cualquier reclamo que se base en un contrato, negligencia, estricta responsabilidad, y otros actos ilícitos.

El comprador y todos los usuarios son responsables por todas las pérdidas o daños que resultasen por el uso o manipulación en condiciones que estén más allá del control de esta Compañía, incluyendo pero no limitándose a: incompatibilidad con productos que no sean los señalados en las Instrucciones, aplicación o contacto con vegetación que no se quiera destruir, condiciones climáticas inusuales, condiciones de clima que estén fuera de los límites que se consideran normales en el lugar de la aplicación y para el periodo de tiempo en el cual se aplica, así como condiciones de

clima que estén fuera de los límites indicados en las Instrucciones, aplicaciones que no estén explícitamente aconsejadas en las Instrucciones, condiciones de humedad que estén fuera de los límites establecidos en las Instrucciones, o la presencia de productos en la tierra o sobre ella, en las plantas o en la vegetación que se está tratando, diferentes a los indicados en las Instrucciones.

Monsanto compañía no garantiza ninguno de los productos reformulados o reempacados de este producto, excepto de acuerdo a los requisitos de la administración de esta compañía y con el permiso escrito expreso de esta compañía.

LA UNICA Y EXCLUSIVA COMPENSACION AL USUARIO O COMPRADOR Y EL LIMITE DE RESPONSABILIDAD DE ESTA COMPAÑIA O DE CUALQUIER OTRO VENDEDOR POR CUALQUIER PERDIDA O POR TODAS LAS PERDIDAS, PERJUICIOS O DAÑOS QUE RESULTASEN DEL USO O MANEJO DE ESTE PRODUCTO (INCLUYENDO RECLAMOS QUE SE BASEN EN UN CONTRATO, NEGLIGENCIA, ESTRUCTA RESPONSABILIDAD Y OTROS ACTOS ILICITOS) SERA EL PRECIO PAGADO POR EL USUARIO O EL COMPRADOR POR LA CANTIDAD INVOLUCRADA DE ESTE PRODUCTO, O A ELECCION DE ESTA COMPAÑIA O DE OTRO VENDEDOR, EL REEMPLAZO DE DICHA CANTIDAD, O SI NO SE OBTUVO MEDIANTE COMPRA SE REEMPLAZARA DICHA CANTIDAD DEL PRODUCTO. EN NINGUN CASO ESTA COMPAÑIA U OTRO VENDEDOR SERAN RESPONSABLES POR DAÑOS INCIDENTALES, CONSECUENTES O ESPECIALES.

En el momento de abrir y usar el producto, se asume que el comprador y todos los usuarios han aceptado las condiciones de los LIMITES EN LA GARANTIA Y EN LA RESPONSABILIDAD que no pueden variar por medio de ningún acuerdo verbal o escrito. Si las condiciones son inaceptables, devuelva el producto inmediatamente sin abrir el recipiente.

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